



S00004329



RCRA COMPLIANCE AND ENFORCEMENT BRANCH ENFORCEMENT CASE RECOMMENDATION WORKSHEET¹

EPA ID NUMBER: PAD987271012	FACILITY NAME: Dial Corporation
CASE REVIEW OFFICER: Rebecca Serfass	REVIEW START DATE:
<p>FINDINGS OF INITIAL CASE REVIEW:</p> <p>Inspection conducted on 5/17/16 Tiered for APO @ September 2016 Docket meeting Violations including: Storage for greater than 90 days, Mismanagement of Universal Waste, Failed to notify under correct generator status, Failed to submit biennial reports, Failed to keep containers closed.</p>	
<p>DISPOSITION RECOMMENDATION: JUD REF APO AO NOV 3013 7003 <u>CLOSE</u> OTHER:</p>	
<p>JUSTIFICATION FOR RECOMMENDATION:</p> <p>Facility entered into Consent Agreement (CA) with EPA on 12/20/17 after returning to compliance and certified their compliance as part of the CA. Paid timely penalty of \$44,598</p>	
CONCURRENCE SECTION	
CASE REVIEW OFFICER <i>Rebecca Serfass</i>	DATE: <i>1/26/18</i>
BRANCH CHIEF RCRA WASTE BRANCH <i>James Murray</i>	DATE: <i>2/1/18</i>
ASSOCIATE DIRECTOR OFFICE OF RCRA PROGRAMS <i>Carol Grund</i>	DATE: <i>2/1/18</i>

¹This is a pre-decisional document protected by the deliberative process and attorney work product privileges (and may also be privileged attorney-client communication). Conclusions or recommendations are intended solely as primary information for government personnel. This worksheet contains tentative conclusions and staff-level recommendations and does not create any rights, or procedural, or defenses, as they are not binding on the Agency or the Department of Justice.

Resource Conservation and Recovery Act – Subtitle C

Compliance Evaluation Inspection Report

By: Rebecca Serfass

Dial Corporation

*125 Jaycee Drive
West Hazelton, PA 18201*

EPA ID No. – PAD987271012

NAICS Code: 325611

“Small Quantity Generator”

Inspection Date: May 17, 2016

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1.0 Introduction

On May 17, 2016, the United States Environmental Protection Agency, Region III ("EPA") Land and Chemicals Division ("LCD"), Office of Land Enforcement conducted an unannounced Compliance Evaluation Inspection ("CEI") under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. of Dial Corporation ("Dial" or Facility"). EPA LCD Representatives notified Pennsylvania Department of Environmental Protection ("PADEP") of the inspection. No PADEP representatives were present for the inspection.

Inspectors arrived at the Facility around 9:30AM. There was a sign outside the Facility that said Henkel. Upon entering, inspectors confirmed that Henkel is the parent company of Dial and that the Facility's official name is Dial Corporation. Inspectors entered the building and were greeted by a security guard who instructed the inspectors to watch a safety video and sign in on the guest log before they could go any further into the Facility. The inspectors were then greeted by Facility representatives, Janine Surmick and Tony Swetz. Inspectors showed them their credentials and shared with them the scope of the inspection. Facility representatives directed inspectors to a conference room where they gathered some background information about the Facility, its processes, and its waste generation.

2.0 Facility Background Information

2.1 Description of Facility

Dial is mainly an antibacterial soap and laundry detergent manufacturer that carries out operations in an approximately 260,000 square foot building. The Facility employs about 186 people and operates during 3 shifts, 5 days a week with weekend overtime. The Facility was established in this location in 1988 and has a sister facility in St. Louis, Missouri. The Facility's products go solely to distribution centers. According to Facility representative, products never go directly to household customers, but to distribution centers before they are placed in retail stores.

2.2 Facility Permit Status

The Facility currently has a Storm Water Permit and a Waste Water Treatment Permit for the discharge of waste water from cleaning out batch tanks and water that goes down the sinks located in the Lab. See Records Review section for more information.

2.3 Process Description

The Facility receives bulk chemical raw materials through a loading dock outside of the Facility. Tanker trucks hook up lines that feed directly into batch tanks for either laundry care or beauty care.

The Facility's laundry care involves an all automated process of mostly bulk addition of raw materials to batch tanks with minor addition of dyes. For beauty care, the Facility employees pre-weigh and stage minor materials that are added into batch tanks. Beauty care also involves the addition of chemicals from totes that are either manually added to product mixing tanks, or automatically pumped into tanks.

The Facility includes an upstairs and a downstairs. Downstairs the batch raw materials coming into the Facility are approved and added to bulk batch tanks. Upstairs the finished products are filled into their appropriate containers, capped, and labeled, before heading back downstairs to the customer service and shipping area.

3.0 Hazardous and Non-Hazardous Waste Generation

- Solvent waste generated in quality testing lab, including MIBK, chloroform, and ethanol used for cleaning and in HPLC machines.
- Waste water from cleaning batch tanks and equipment. No solvents are used to clean tanks, only hot water or caustic wash. Post-cleaning rinse water is collected within holding tanks located below batch tanks. One stream is generated from laundry care area and one stream is generated from beauty care area. They are joined together in one tank through piping before it is sent across the street to the sewer authority. Discharge permit with Greater Hazelton Joint Sewer Authority. According to Facility representative, the Facility is not required to treat the waste water for pH, but sometimes they do.
- Packaging goods (plastic wrap, plastics containers, cardboard, etc.) that are all recycled
- Alcohol ethoxysulfate ("AES") – waste generated from either routine testing of the AES raw product or when AES raw product becomes hydrolyzed due to the chemical's instability. AES waste can be hazardous or nonhazardous, according to Facility representatives, depending on the drop in pH. Facility representatives described this waste stream to be occasional during upsets.
- Universal waste ("UW") – including waste lamps and waste batteries

4.0 Facility Generator Status

At the time of the inspection the Facility representatives stated that Dial is a Small Quantity Generator ("SQG"). The Facility notified the state of its SQG status in 1989 and has not sent a subsequent notification to PADEP or the EPA since.

During the opening conference, Facility representative stated that the Facility may go over into Large Quantity Generator Status ("LQG") on occasion due to acidification of AES raw product. See Section 7.9 in Records Review for more details on Facility waste generation.

5.0 Hazardous Waste Storage

5.1 Less-Than 180-Day Storage Area

The Facility has one (1) less-than 180-day Hazardous Waste Accumulation Area ("HWAA"). It is a flammable storage cabinet that can store two (2) 55-gallon drums. The HWAA is located on the packaging floor in the upstairs area of the Facility. See Inspection Observations for more detail.

5.2 Satellite Accumulation Storage Area

The Facility utilizes Satellite Accumulation Area ("SAA") containers within their quality testing lab. There were five (5) 1-gallon SAA containers within the lab at the time of the inspection.

The Facility also utilizes two (2) SAA containers for collecting waste aerosol cans before they are taken to the Maintenance Shop to be punctured. See Inspection Observations for more detail.

5.3 Universal Waste Storage Area

The Facility stores its Universal Waste ("UW") in The Pit / Recycling Area. The UW lamps are stored in cardboard boxes and the UW batteries are stored in plastic buckets. See Inspection Observations for more details.

6.0 Inspection Observations

6.1 Offloading Station

The Facility's Offloading Station is located outside the Facility where bulk tanker trucks can drive up and deliver various raw products. There are a number of manifolds that feed through the wall of the Facility's building near the Offloading Station and lead directly into batch tanks. The main section of the Offloading Station can be seen in Photo #1. Other lines that trucks can connect to near the main station can be seen in Photo #2 and a safety sign posted at the Offloading Station can be seen in Photo #3.

Facility representative stated that they very rarely clean out the pipe lines leading into the Facility from the Offloading Station because they use the same line for the same product for as long as possible. In the case that the Facility would have to switch lines, they would clean out the line with an appropriate material and send it off as either hazardous or nonhazardous waste depending on what they used.

6.2 Laundry Care Area

Inspectors left the Offloading Station and entered the building through a door that led into the Facility's Laundry Care Area. Upon entering they observed two, 2,500-pound totes that contained AES (See Photo #4). The tote on the right was labeled as non-hazardous waste (See Photo #5), while the tote on the left was labeled as "acidic AES" (See Photo #6). According to Facility representatives, the AES waste was generated from routine testing of the raw product. Facility representatives stated that this AES in particular was tested and did not meet product specifications. Although the AES can acidify to the point where it is below a pH of 2 and is considered a hazardous waste, Facility representatives stated that they cannot use the AES if it is below a pH of 8.2. According to Facility representatives the totes pictured have a pH of less than 8.2, but above 2.0.

Inspectors questioned Facility representatives on whether the AES could acidify further due to its instability and become hazardous. They stated that they will test the material again before it is shipped off site as a waste. Facility representatives also stated that the manufacturer of the AES has made some changes to the material in order to make it more stable.

There was a funnel and bucket on top of one of the AES totes (See Photo #7). According to Facility representatives this was used for testing the AES material inside the totes. Similar buckets were seen to the right of the totes turned upside down on a spill container (See Photo #8). A close up of the container can be seen in Photo #9. According to Facility representatives, these buckets are used to test incoming raw material from the tanker trucks before they unload it into the batch tanks. Typically this material is not hazardous, unless the AES has acidified before it arrived to the Facility, in which case inspectors cautioned Facility representatives to treat the waste accordingly if it is ever hazardous.

Inspectors walked through the Laundry care area of the Facility and observed many batch tanks. Inspectors asked the Facility representatives how the tanks are cleaned. They stated that they are cleaned regularly with a caustic wash (see Records Review section for SDS). After cleaning the tanks, the caustic wash along with any tank residue is drained into holding tanks. Waste water from the Laundry Care Area and the Beauty Care Area are combined through piping into a tank before it is sent to the sewer authority. Facility representative stated that the combination of the two waste water streams usually balances out the pH, but that they will occasionally add sodium carbonate or citric acid as necessary to bring the pH up or down before sending it off.

6.3 Beauty Care Area

Next, the inspectors entered the raw material storage area for beauty care. Upon entering the storage area, inspectors observed raw product that had some of its contents spilled onto the warehouse floor (See Photo #10). A close-up of this material can be seen in Photo #11. Facility representative said that typically the manager of the area on duty that day will come around and inspect everything and clean up any spills of this type and dispose of the material accordingly.

The rest of the raw product storage area appeared to be managed and organized well and there were no other spills or concerns noted in that area.

6.4 Packaging Area

Upon entering the Packaging area, inspectors observed a plastic cabinet that contains two 55-gallon drums of waste oil (See Photo #12). Inspectors noted that one of the bungs on a waste oil drum was open (See Photo #13).

Next to the plastic cabinet was a plastic container that was labeled "Empty Aerosol Cans Only". The lid of the container had an open hole in the middle of it (See Photo #14). The Facility accumulates spent aerosol cans in this container before they are collected biweekly and taken to the Maintenance Shop off of the Packaging Line to be punctured.

Inspectors observed three beauty packaging lines and 4 laundry packaging lines. The only waste generated in this area, according to Facility representatives, is recyclable material, like excess plastic wrap or product containers that fell on the floor. The Facility has large wooden recycling crates near the packaging lines for employees to separate these materials into.

6.5 Shipping Area

Inspectors observed a maintenance shop off of the Shipping Area. Within this maintenance shop was a parts washing station that was labeled with a Crystal Clean logo and according to Facility representatives is managed by Crystal Clean (See Photo #15).

In the Shipping Area, inspectors observed many pallets full of boxed product that were wrapped in tarp. This area contained all products that were ready to be shipped out to one of the four domestic warehouses that this Facility supplies to.

6.6 Lab

Outside of the Facility's quality testing was a washer and dryer. Facility representative stated that these are used to launder rags used for maintenance and that no solvents are used on these rags.

Upon entering the lab, inspectors met the Facility's Lab Quality Manager, Mr. Dan Dule who answered inspectors' questions regarding the lab. There were five satellite containers in use within the lab at the time of the inspection that were approximately 1 gallon each. Three were labeled as "LC Mobile Phase Waste" and two were labeled as "MIBK/Ethanol Waste" (See Photos #16-20). One of the satellite accumulation containers within a fume hood was open when inspectors observed it (See Photo #19), but they also saw an employee working nearby that entered the fume hood to continue operations as the inspectors walked away.

The satellite accumulation containers within the lab are used to collect waste coming from the HPLC machines the Facility uses to test product quality and for cleaning or other testing purposes within fume hoods. A Facility employee stated that the satellite accumulation containers are usually emptied once or twice a day and are not usually full when they do so. Facility representatives also stated that the sinks within the lab are connected to the waste water treatment tank.

6.7 Hazardous Waste Accumulation Area

Inspectors observed the Facility's HWAA to be a flammable storage cabinet against the wall near the packaging lines (See Photo #21). Within the storage cabinet was two 55-gallon drums (See Photo #22). The drum on the left contained hazardous waste, while the drum on the right was empty. They were both labeled as hazardous waste and the drum on the left had a start accumulation date of "5-5-16" and was labeled as "Mobile Phase Waste" (See Photo #23). An additional label on the left side drum can be seen in Photo #24.

Facility representatives stated that once one of the drums is full, they begin to fill the other one. Once both of them are full, they transfer them downstairs to be shipped. The Facility fills two 55-gallon drums about every two months, or one 55-gallon drum per month.

There was an emergency spill kit located inside of the storage cabinet and emergency information posted outside the side of the cabinet (See Photo #25). A phone was observed nearby.

Next to the HWAA was a second plastic container labeled "Empty Aerosol Cans Only" with a hole in the top of its lid (See Photo #26). Upon opening the container, inspectors observed 2 aerosol cans (See Photo #27).

6.8 Universal Waste Storage Area

The Facility's UW is stored in an area called "The Pit / Recycling Area". Upon entering this area, inspectors observed shelving that contained waste ink on it. Facility representative stated that typically they let the ink evaporate and then it is recycled. Upon inquiring, Facility representatives provided the inspectors with the SDSs for the two types of inks seen on the shelf to confirm that they were not solvent based (See Record Review section for SDSs) (See Photos #28-#31). Facility representatives informed inspectors that they do occasionally use a solvent based ink (See Records Review Section for SDS) that they do not treat in this way and would dispose of as HW. Inspectors reviewed the SDS for the solvent based ink, but there did not appear to be any of this waste ink at the Facility at the time of the inspection.

Next to the shelf with the waste ink was another shelf containing the UW lamps. When the inspector asked the Facility representative to turn the box so that they could look for a start accumulation date, the end of the cardboard box ripped off (See Photo #32). There were three boxes of UW lamps present at the time of the inspection. One had a start date of "12-9-15", one of "3-30-16", and one of "10-6-15". The inspectors looked to see if the boxes were labeled as

“Universal Waste” or another appropriate phrase and could not find a label initially. Upon looking, Facility representative discovered that the Universal Waste label was located under the shipping label and had not had the “lamp” box checked off (See Photo #33).

On the same shelving was the Facility’s UW batteries (See Photo #34). The two buckets seen in Photo #34 were labeled with start accumulation dates of “4/7/16” and “5/9/16” and were labeled as “1 GAL DRY CELL BATTERY RECYCLING KIT” (See Photo #35). The batteries within the buckets were individually bagged. There was an additional UW battery bucket on the bottom shelf that according to Facility representatives contained mixed waste batteries (See Photo #36). This bucket did not have a start accumulation date on it.

Also observed in this area were large wooden crates containing separated recyclable material including electrical wires, cardboard, and plastic containers. There was an open “Duffy” trailer connected to the loading dock in this area that the Facility employees fill up and ship off to the recycling company who leave an empty trailer each time. Facility representatives stated that they recycle about 35-40 tons of material per month.

6.9 Maintenance Shop off of Packaging Line

Within this additional Maintenance Shop off of the Packaging Line, inspectors observed an aerosol can puncturing unit that was attached to a 35-gallon drum (See Photo #37). There was a start accumulation date of “2/28/16” on the drum (See Photo #38). Facility representative stated that he collects the aerosol cans from the two satellite accumulation containers biweekly and that there are usually 8 or 9 every other week total between the two SAA containers. There is a bagged liner inside of the drum that collects the aerosol can contents as the cans are punctured. A waste oil drum with an open funnel was also observed in this area (See Photos #39 and #40).

Across the room, inspectors observed a flammable cabinet that contained unused or in-use aerosol cans (See Photos #41 - #43).

7.0 Records Review

Inspectors asked Facility representatives to see various records for review. The requested documents are as follows:

7.1 Safety Data Sheet (SDS) for:

- Squid Ink (SI-60-P) seen in Photo #29 (Attachment A)
- TWP-181 Ink seen in Photo #30 (Attachment B)
- Linx Solvent Based Ink (Attachment N)
- AES (Sodium Laureth Sulfate 7EO) (Attachment C)
- Caustic Wash (CP-750) (Attachment D)

7.2 Training records for:

- Daniel Dule (Lab Manager), 3 years (Attachment E)
- Tony Swetz (Environmental Coordinator), 3 years (Attachment F)

7.3 Biennial Reports

- Facility has never submitted a biennial report according to Facility representatives.

7.4 Contingency Plan

- Facility did not have a contingency plan at the time of the inspection. They did have an Emergency Response Plan that they provided to inspectors seen in Attachment G.

7.5 Weekly Inspection Logs for Hazardous Waste Accumulation Area

- 3 years of logs were reviewed
- Signed by ("PO") Patty O'Donnell and other undetermined employees. Facility did not have training records for Ms. O'Donnell.
- Examples of weekly inspection logs seen in Attachment H.

7.6 Bills of Lading ("BOLs") for Universal Waste Shipments

- 3 years of BOLs for UW shipments were reviewed by inspectors. Copies of the most recent shipment can be seen in Attachment I.

7.7 BOLs for Sale of "Clean Out" AES

- Inspector inquired if the Facility can or does recycle hydrolyzed AES. They did not show any instances of recycling AES, but stated that on two occasions they sold unused and unhydrolyzed AES that was generated from 2 separate system clean outs while switching over to a new formulation of the material. The two BOLs can be seen in Attachment J.

7.8 Waste Water Treatment Permit

- Inspectors requested a copy of the Facility's Waste Water Treatment permit that can be seen in Attachment K

7.9 Hazardous Waste Manifests

- 5 years of HW Manifests were requested by inspectors. Facility representative stated that the Facility has a 3 year retention policy for HW Manifests and would bring as

far back as they had. Examples of Facility Hazardous Waste Manifests can be seen in Attachment L.

- The occasional upset the Facility described when addressing sending acidified AES off as HW appeared on the manifests much more frequently than Facility representatives had originally described.
- Chart beginning on page 12 of this inspection report depicts HW Manifest information from 1-9-12 through 5-5-16.

8.0 Post-Inspection Documents Addressing Inspection Observations

Subsequent to the CEI performed at the Facility on 5/17/16, Facility representative sent an email to the EPA inspector documenting the actions they have taken on some of the observations made during the inspection. That email can be seen in Attachment M.

<u>Manifest #</u>	<u>Date</u>	<u>Amount (G)</u>	<u>Amount (lbs)</u>	<u>Amount (kg)</u>	<u>Waste Code(s)</u>	<u># of containers</u>	<u>Signed?</u>
008925264	1/9/2012	110	---	400.40	D001, F003	2 DR	X
008925264	1/9/2012	110	---	400.40	D001	2 DR	X
008925266	1/9/2012	---	50	22.73	D008	2 DF	X
008925266	1/9/2012	---	10	4.55	D002	1 DF	X
008925266	1/9/2012	---	10	4.55	D009, U151	1 DF	X
008925266	1/9/2012	---	400	181.82	NONE	1 DF	X
005015352	3/13/2012	55	---	200.20	D001, F003	1 DR	X
009543557	3/14/2012	---	120	54.55	D001	2 DF	X
009543557	3/14/2012	---	30	13.64	D002	1 DF	X
009543756	5/7/2012	---	675	306.82	D001, F003	2 DR	X
009543755	5/7/2012	---	50	22.73	D001, D002, U122	2 DF	X
009543755	5/7/2012	30	---	109.20	D002	2 DF	X
009543200	8/10/2012	40	---	145.60	D002	2 DF	X
009543200	8/10/2012	150	---	546.00	D002	3 DF	X
009543193	8/10/2012	---	900	409.09	D001, F003	2 DR	X
009544659	11/1/2012	---	250	113.64	D001, D035, F003, F005	1 DR	X
009544658	11/1/2012	---	450	204.55	D001, F003	1 DR	X
009544782	11/28/2012	---	300	136.36	D001, F003	1 DR	X
2012	Total	G	lbs	kg	monthly avg (kg)		
		495	3245	3276.80	273.07		
011074086	2/1/2013	---	750	340.91	D001, F003	2 DR	X
011074116	2/1/2013	---	100	45.45	D001	2 DF	X
011074395	4/25/2013	4500	---	16380.00	D002	18 TOTES	X
011074480	4/25/2013	---	900	409.09	D001, F003	2 DR	X
011073505	5/13/2013	2500	---	9100.00	D002	11 TOTES	X
011073505	5/13/2013	165	---	600.60	D002	3 DF	X
011073574	5/13/2013	30	---	109.2	D001	1 DR	X
010407232	6/21/2013	2131	---	7756.84	D002	1 TT	X
011073035	8/5/2013	---	800	363.64	D001, F003	2 DR	X
011073386	10/16/2013	---	450	204.55	D001, F003	1 DR	X
011696244 JJK	12/31/2013	3000	---	10920.00	D002	1 TT	X
2013	Total	G	lbs	kg	monthly avg (kg)		
Dial Corporation – PAD987271012		12326	3000	46230.28	3852.52		

Manifest #	Date	Amount (G)	Amount (lbs)	Amount (kg)	Waste Code(s)	# of containers	Signed?
012187401 JJK	1/6/2014	---	1000	454.55	D001, F003	2 DR	X
012187426 JJK	1/6/2014	4675	---	17017.00	D002	17 TOTES	X
012187402 JJK	1/7/2014	30	---	109.20	D002	1 DR	X
012187435 JJK	1/7/2014	---	14,850	6750.00	D002	6 TOTES	X
011694241 JJK	1/10/2014	1750	---	6370.00	D002	1 TT	X
012187425 JJK	1/10/2014	4675	---	17017.00	D002	17 TOTES	X
012187413 JJK	1/10/2014	4675	---	17017.00	D002	17 TOTES	X
012187414 JJK	2/11/2014	2850	---	10374.00	D002	6 TOTES	X
012187341 JJK	2/11/2014	---	450	204.55	D001, F003	1 DR	X
012186852 JJK	3/17/2014	30	---	109.20	D001	1 DR	X
012770555 JJK	3/25/2014	1050	---	3822.00	D002	1 TT	X
012186910 JJK	4/7/2014	55	---	200.20	D001, F003	1 DR	X
012186906 JJK	4/7/2014	---	40,500	18409.09	D002	15 TOTES	X
012186906 JJK	4/7/2014	---	125	56.82	D002	1 DR	X
006923669 FLE	4/15/2014	5000	---	18200.00	D002	20 TOTES	X
013255066 JJK	6/2/2014	2300	---	8372.00	D002	1 TT	X
013255220 JJK	6/3/2014	2400	---	8736.00	D002	1 TT	X
013255221 JJK	6/4/2014	1800	---	6552.00	D002	1 TT	X
012187843 JJK	6/17/2014	30	---	109.20	D002	1 DR	X
012187833 JJK	6/17/2014	---	900	409.09	D001, F003	2 DR	X
012187844 JJK	6/17/2014	750	---	2730.00	D002	3 TOTES	X
012187844 JJK	6/17/2014	55	---	200.20	D002	1 DR	X
013398841 JJK	9/18/2014	---	1000	454.55	D001	1 TOTE	X
007685201 FLE	9/29/2014	2250	---	8190.00	D002	9 TOTES	X
007685200 FLE	9/29/2014	---	12,900	5863.64	D002	1 TT	X
007685256 FLE	9/30/2014	---	7760	3527.27	D002	1 TT	X
007684141 FLE	11/5/2014	1750	---	6370.00	D002	1 TT	X
007685041 FLE	12/11/2014	3400	---	12376.00	D002	14 TOTES	X
007684849 FLE	12/23/2014	---	5560	2527.27	D002	1 TT	X
007685113 FLE	12/23/2014	---	1000	454.55	D001, D022, F003	2 DR	X
007685113 FLE	12/23/2014	45	---	163.80	D001	1 DR	X
		G	lbs	kg	monthly avg (kg)		
2014	Total	39570	86,045	183146.16	15262.18		

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<u>Manifest #</u>	<u>Date</u>	<u>Amount (G)</u>	<u>Amount (lbs)</u>	<u>Amount (kg)</u>	<u>Waste Code(s)</u>	<u># of containers</u>	<u>Signed?</u>
007685818 FLE	2/19/2015	2475	---	9009.00	D002	9 TOTES	X
007685819 FLE	2/19/2015	---	650	295.45	D001, D002, D022, F003	2 DR	X
008205536 FLE	5/15/2015	---	11,000	5000.00	D002	1 TT	X
008210118 FLE	6/1/2015	---	44,200	20090.91	D002	---	X
008210120 FLE	6/1/2015	---	900	409.09	D001, D002, D022, F003	2 DR	X
008210120 FLE	6/1/2015	---	100	45.45	D001, D002, D022, F003	1 DR	X
008210120 FLE	6/1/2015	---	450	204.55	D001	1 DR	X
008210119 FLE	6/1/2015	---	15,750	7159.09	D002	7 TOTES	X
007675178 FLE	6/29/2015	---	14,220	6463.64	D002	1 TT	X
008949059 FLE	8/13/2015	---	900	409.09	D001	2 DR	X
008949059 FLE	3/13/2015	---	60	27.27	D001, D002, D022, F003	1 DR	X
008949060 FLE	8/13/2015	---	23,500	10681.82	D002	9 TOTES	X
008947562 FLE	8/26/2015	4420	---	16088.80	D002	17 TOTES	X
008947675 FLE	9/4/2015	1040	---	3785.60	D002	4 TOTES	X
008947676 FLE	9/4/2015	---	70	31.82	D001, F003, F005	1 DR	X
008955819 FLE	11/13/2015	---	900	409.09	D001, D022, F003	2 DR	X
008955819 FLE	11/13/2015	---	38	17.27	D001	1 DR	X
2015	Total	G	lbs	kg	monthly avg (kg)		
		7935	112,738	80127.95	6677.33		
009463724 FLE	2/23/2016	---	800	363.64	D001, D002, D022, F003	2 DR	X
009463724 FLE	2/23/2016	---	80	36.36	D001	1 DR	X
009463724 FLE	2/23/2016	---	300	136.36	D002	2 DR	X
009416670 FLE	5/5/2016	---	1000	454.55	D001, D022, F003	2 DR	NO
2016	Total	G	lbs	kg	monthly avg (kg)		
		---	2180	990.91	220.20		

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

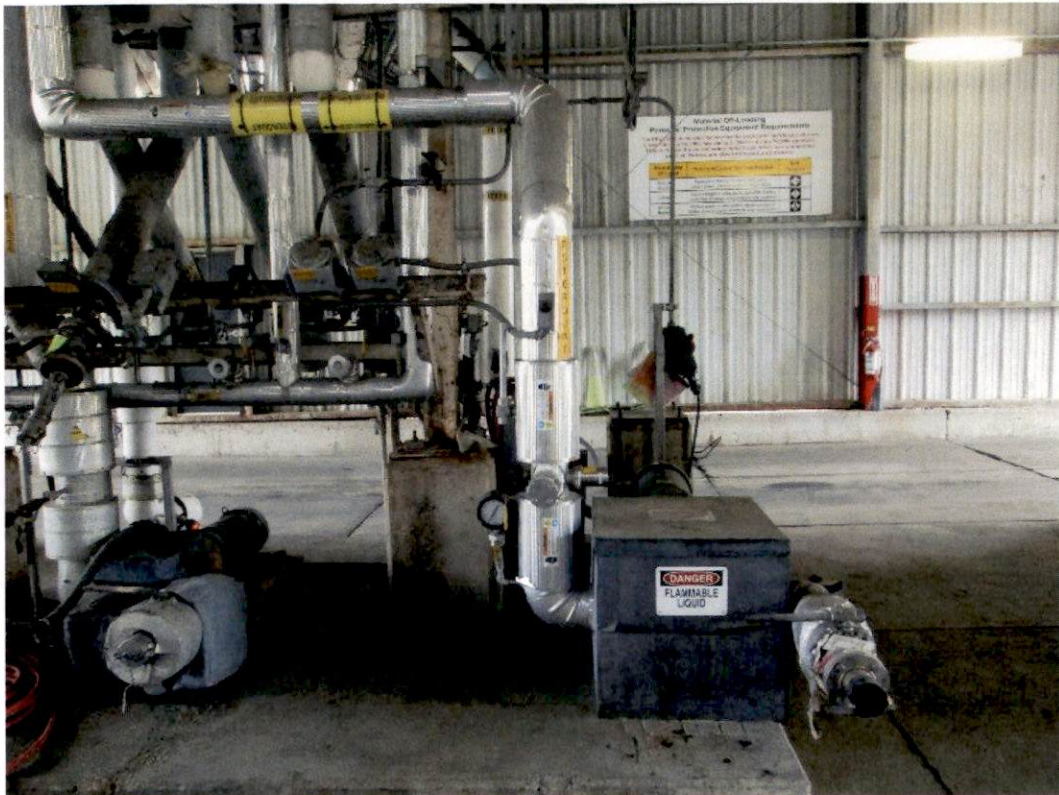


Photo #1: Main section of Off-Loading Station outside Laundry area

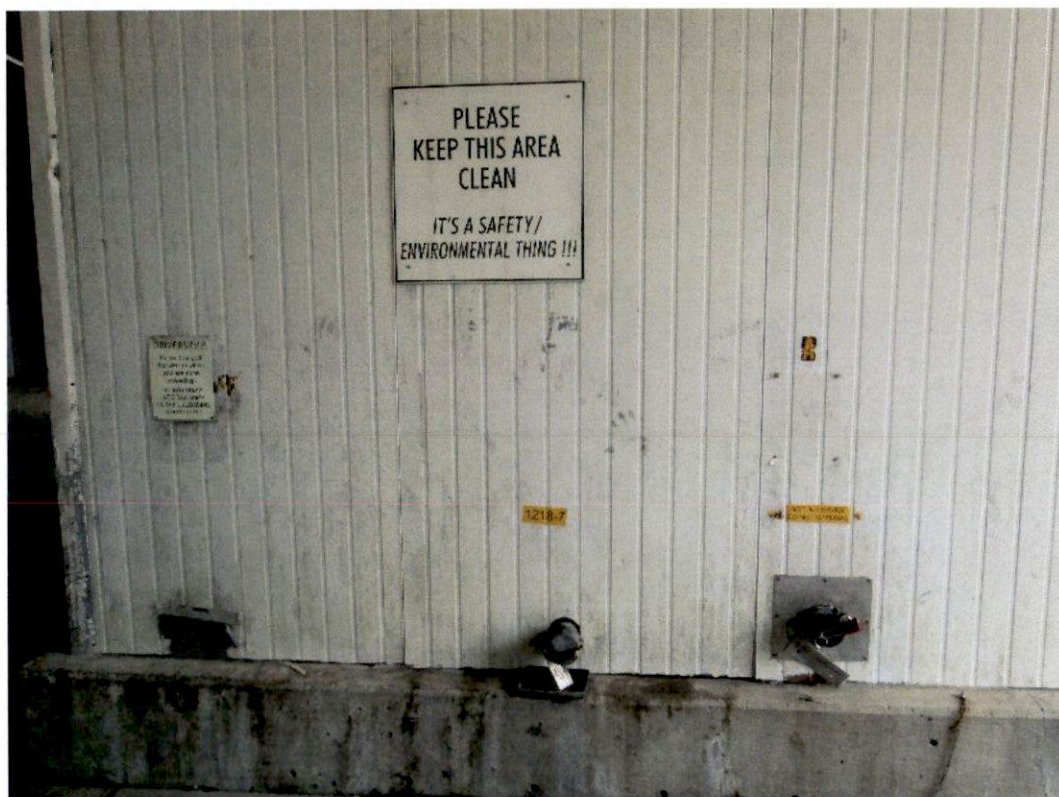


Photo #2: Part of Off-Loading Station outside of Laundry area

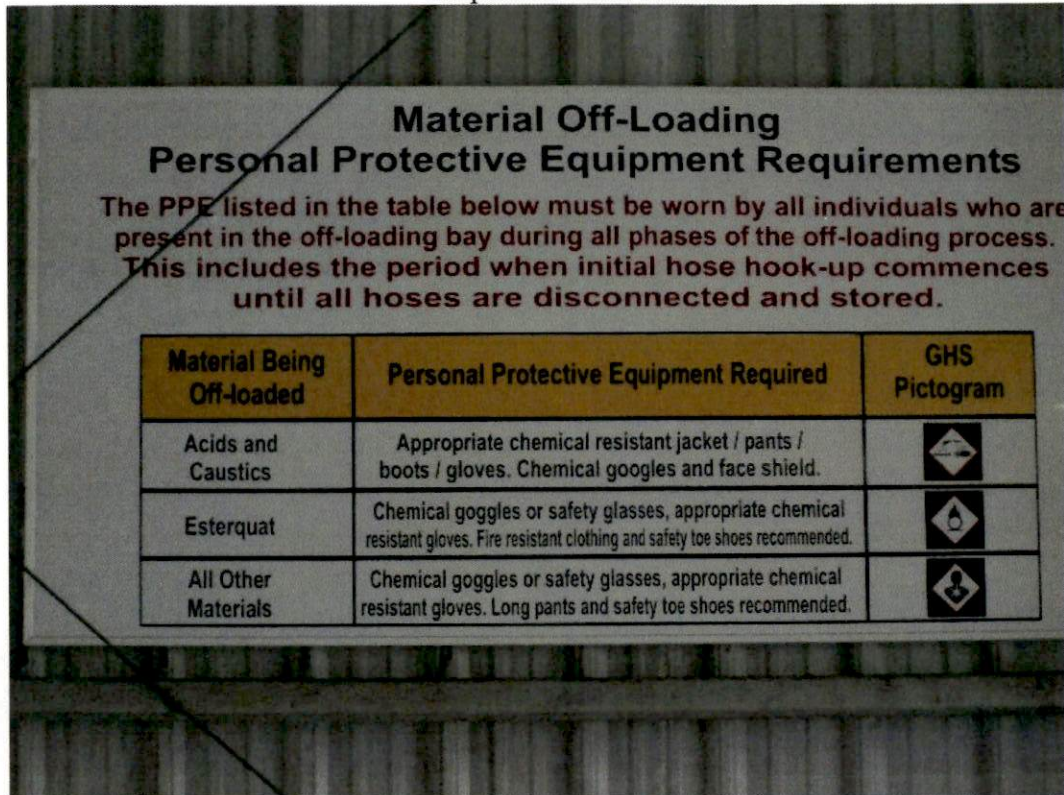


Photo #3: Sign on back wall of Off-Loading Station



Photo #4: Two 2,500 pound totes stated to hold waste AES from quality tests, in Laundry area

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Dial Corporation – PAD987271012
Inspection Date 5/17/16

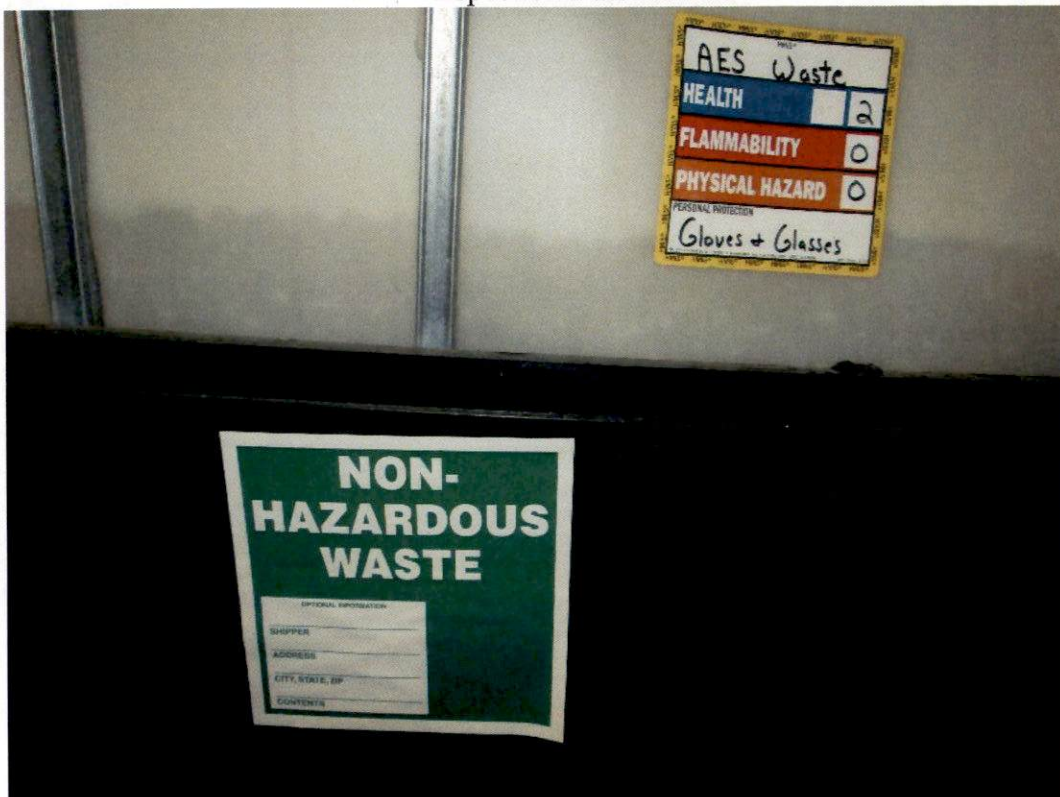


Photo #5: Close-up of labels on Photo #4 right tote

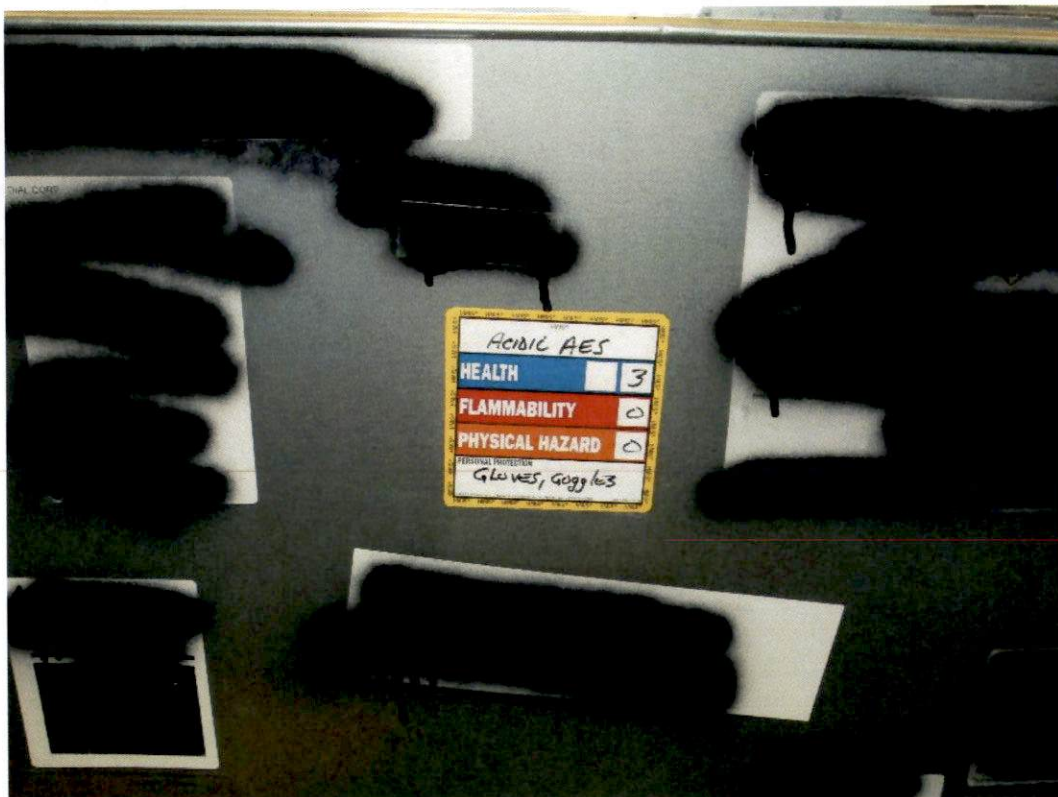


Photo #6: Close-up of label on Photo #4 left tote

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Photo #7: Close-up of bucket and funnel on top of Photo #4 right tote



Photo #8: Spill container with several upended buckets in Laundry area

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Inspection Date 5/17/16



Photo #9: Close-up of standing liquid seen inside Photo #8 spill container

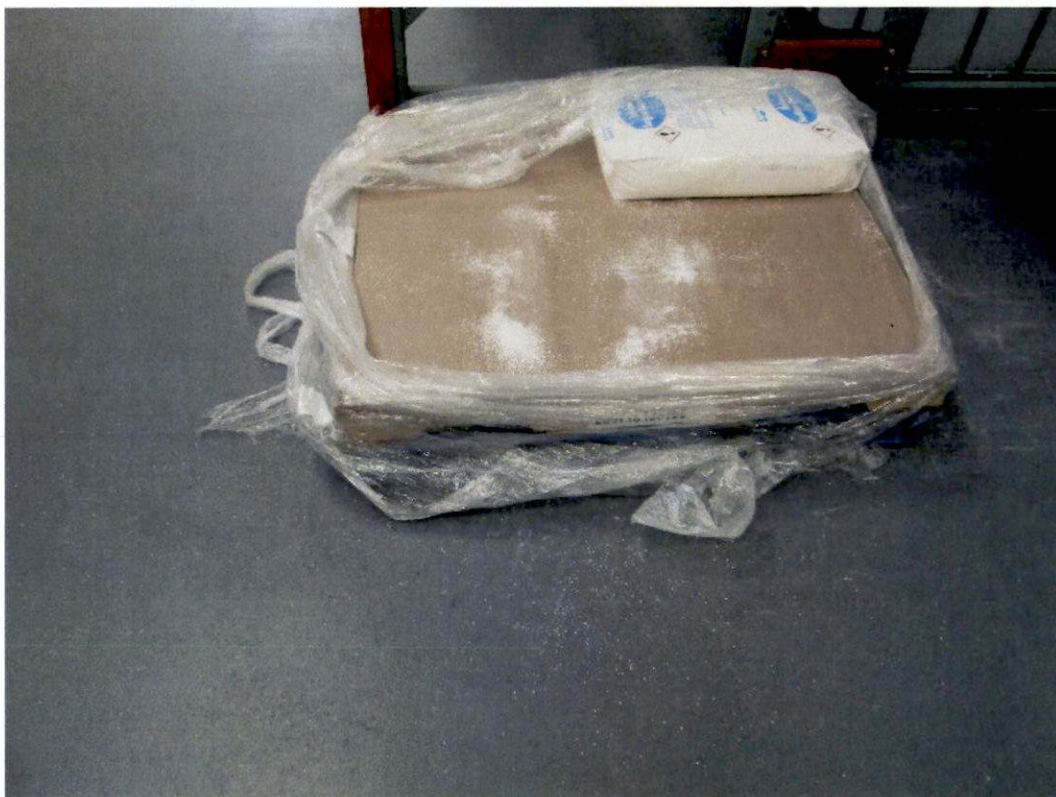


Photo #10: Pallet with some spilled powder in Raw Material Storage area for Beauty

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

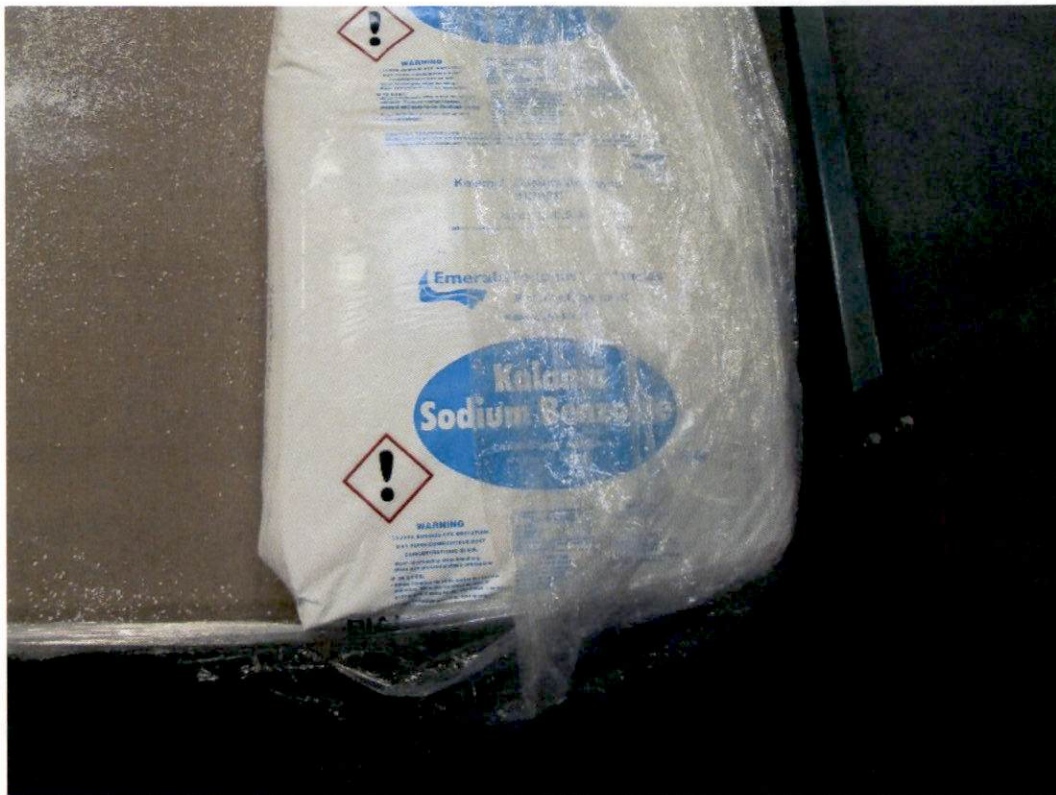


Photo #11: Close-up of bag on Photo #10 pallet



Photo #12: Two 55gal drums with open bung holes in plastic cabinet in Customer Service/Battery Changing area, both labeled "Waste Oil"

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

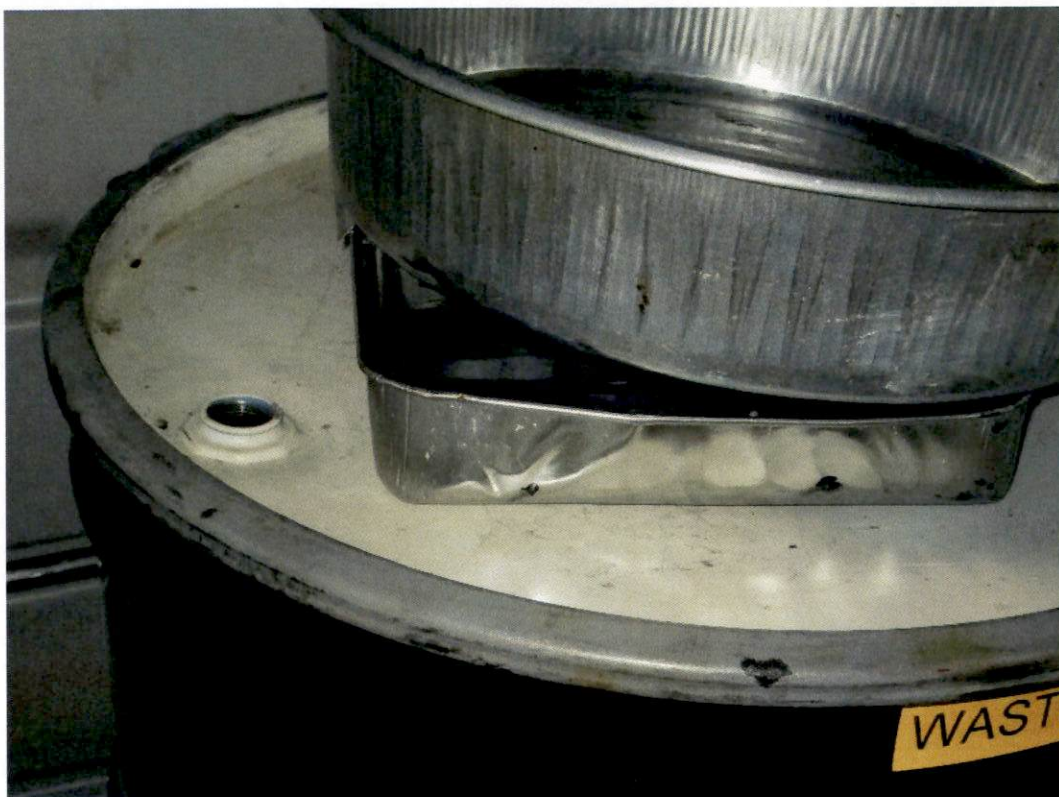


Photo #13: Close-up of open bung hole on Photo #12 right drum



Photo #14: Plastic container next to Photo #12 cabinet, with opening in lid

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #15: Parts washer in Maintenance Shop



Photo #16: 1gal container in Lab attached to HPLC machine, labeled "LC Mobile Phase Waste"

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #41: View inside flam cabinet in Maintenance Shop showing in-use cans and chemicals



Photo #42: Close-up of Photo #41 top two shelves

Photographic Log
Dial Corporation – PAD987271012
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Photo #43: Close-up of Photo #41 bottom two shelves

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #39: 55gal drum in Maintenance Shop w/open funnel, labeled "Waste Oil"

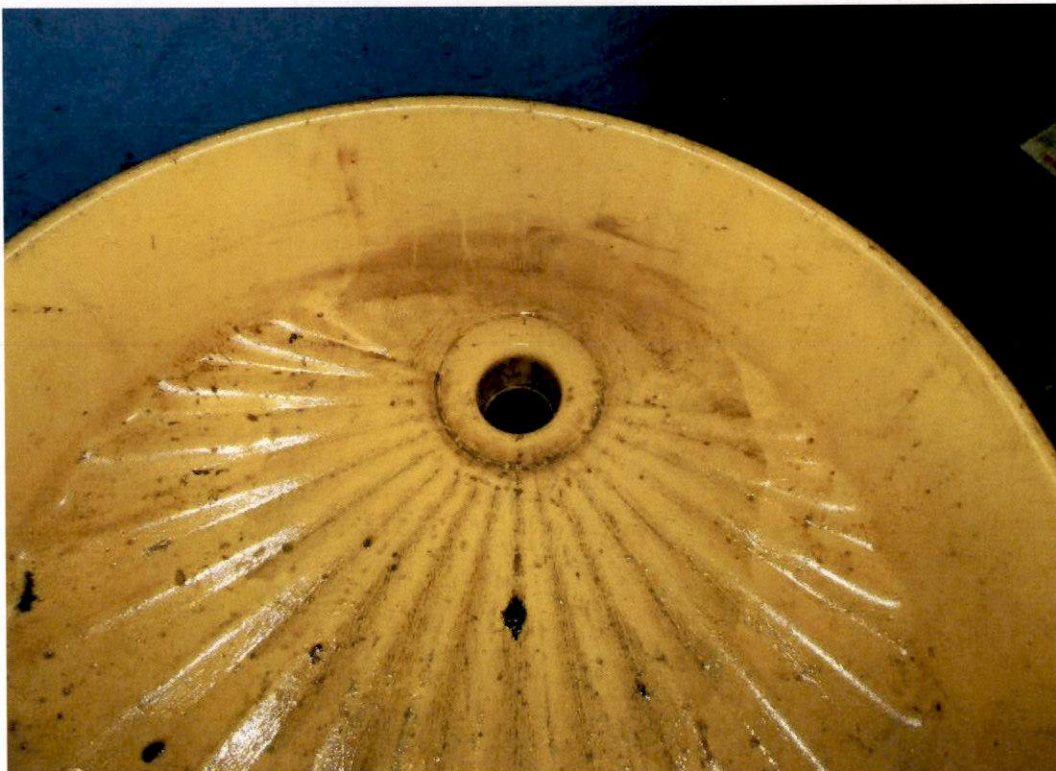


Photo #40: Close-up of Photo #39 open funnel

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #37: 35gal drum in Maintenance Shop w/aerosol can puncture device



Photo #38: Close-up of label on Photo #37 drum

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #33: Close-up of label on Photo #32 bottom right box



Photo #34: Two 1gal containers of used batteries in Recycling Area

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

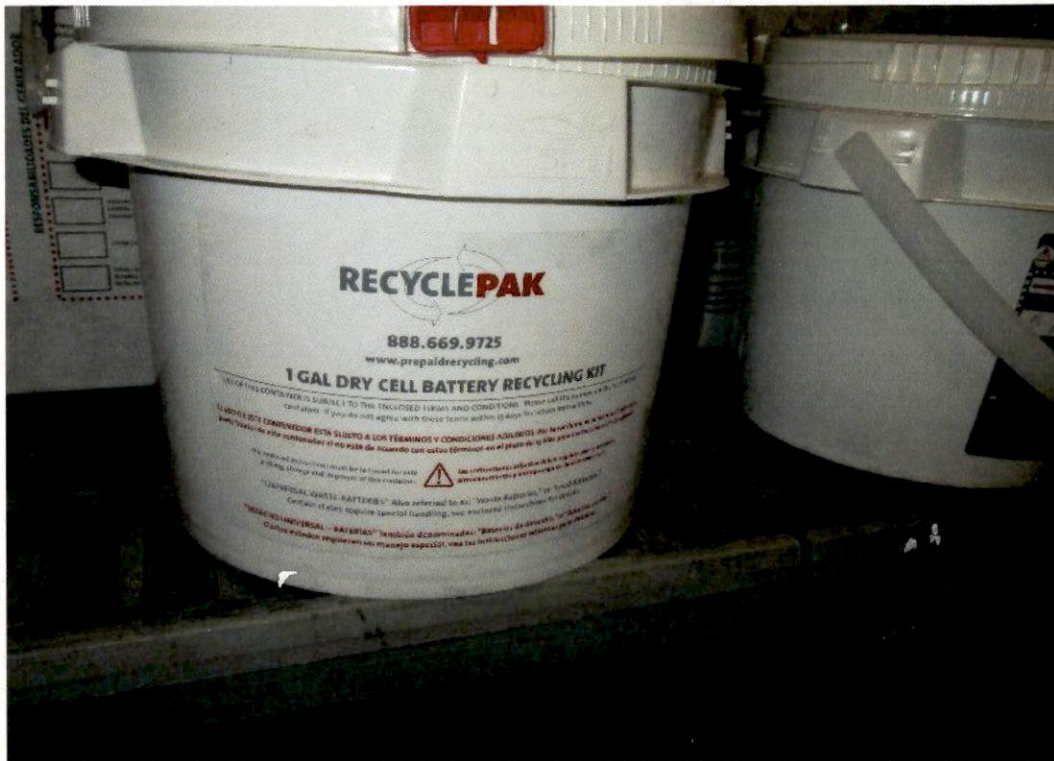


Photo #35: Close-up of label on back of Photo #34 left container

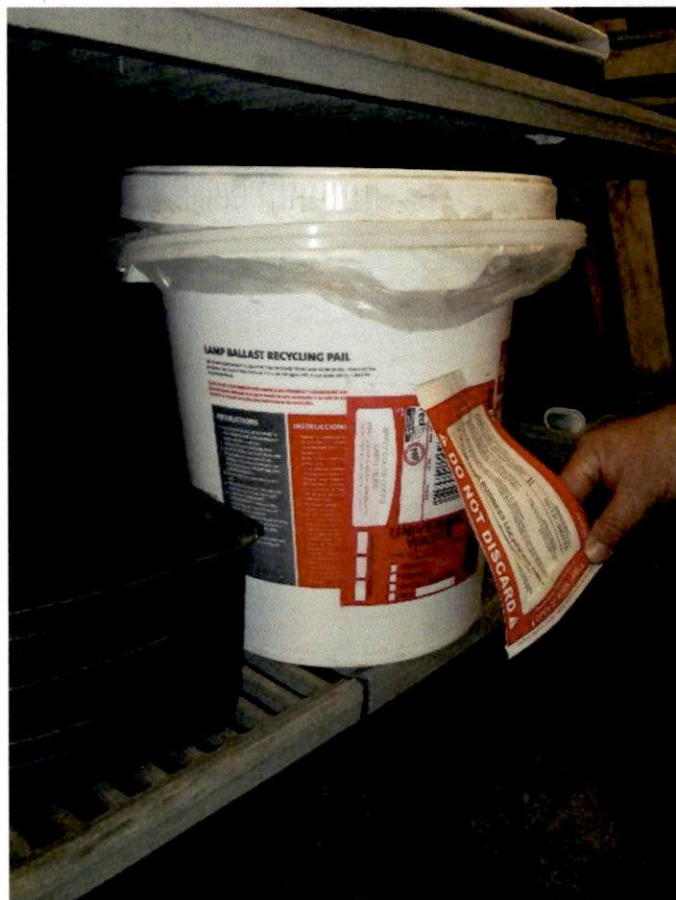


Photo #36: 5gal container of used batteries in Recycling Area

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #31: 1gal container from back of Photo #28 middle shelf, about half full, labeled "Bad Ink"



Photo #32: Three cardboard boxes of used fluorescent lamps in Recycling area -- top front box broke when facility employee tried to lift it

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

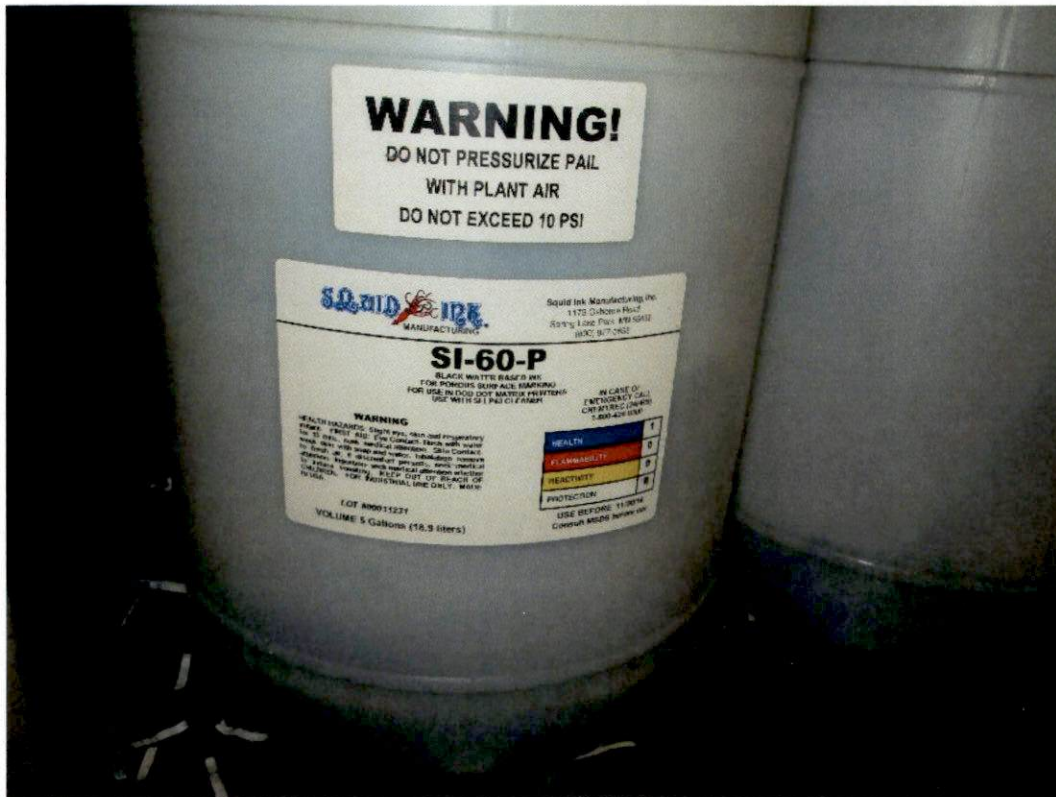


Photo #29: Close-up of labels on Photo #28 center left container

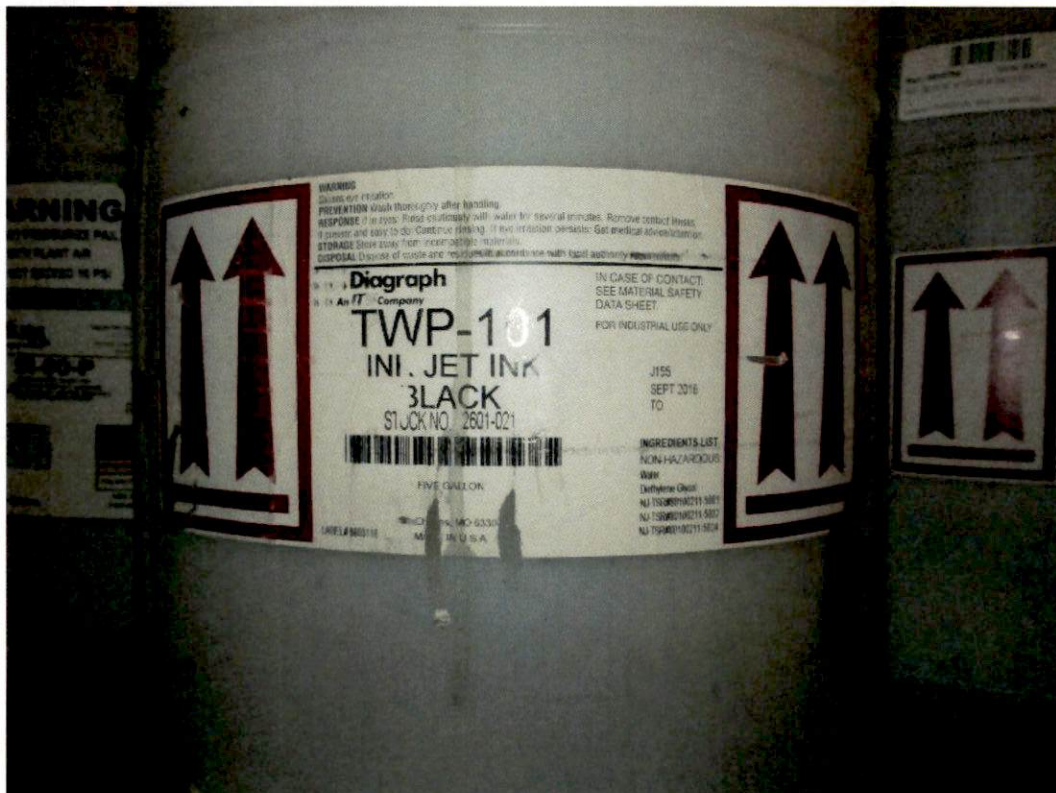


Photo #30: Close-up of label on Photo #28 top left container

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

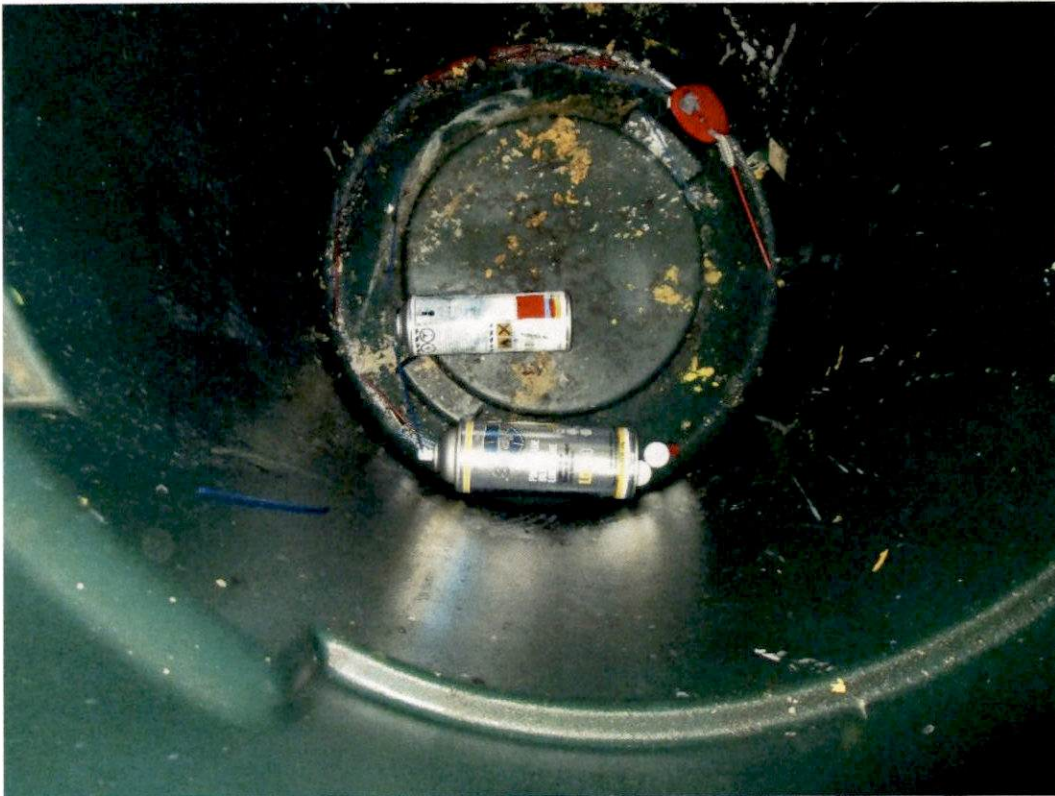


Photo #27: View inside Photo #26 container showing two spent aerosol cans



Photo #28: 14 x 5gal containers (top two shelves) in "The Pit"/Recycling area, described as holding leftover ink

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

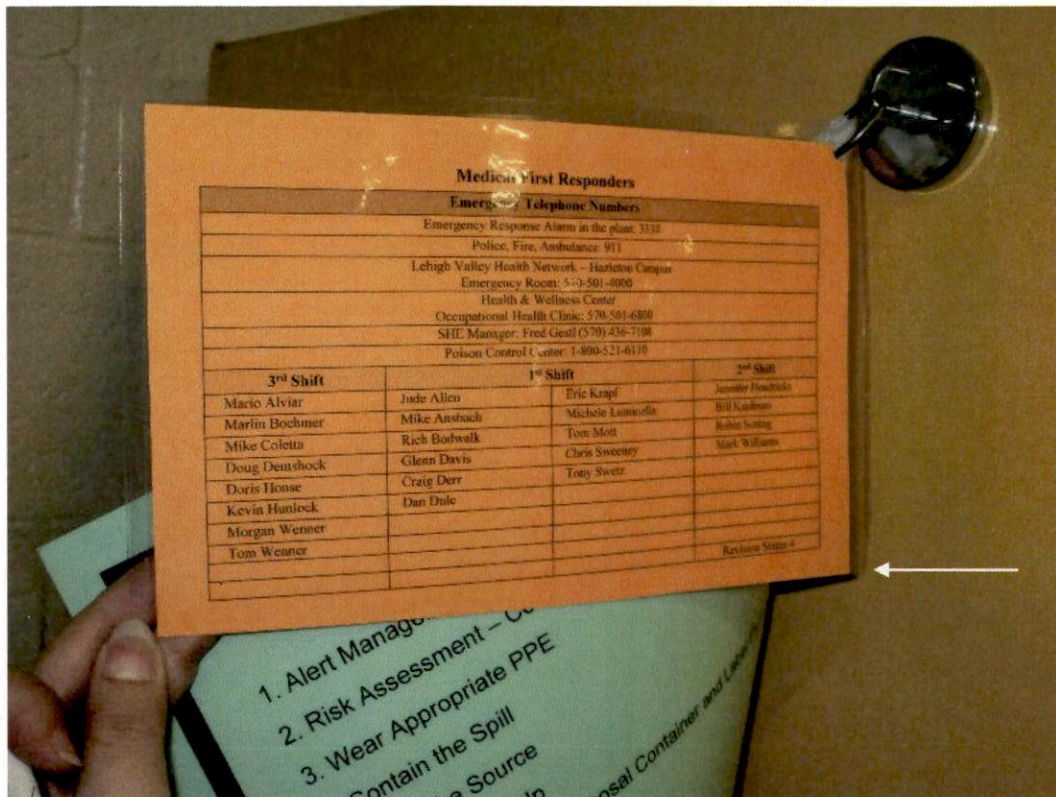


Photo #25: Emergency contacts card attached to outside of Photo #21 cabinet

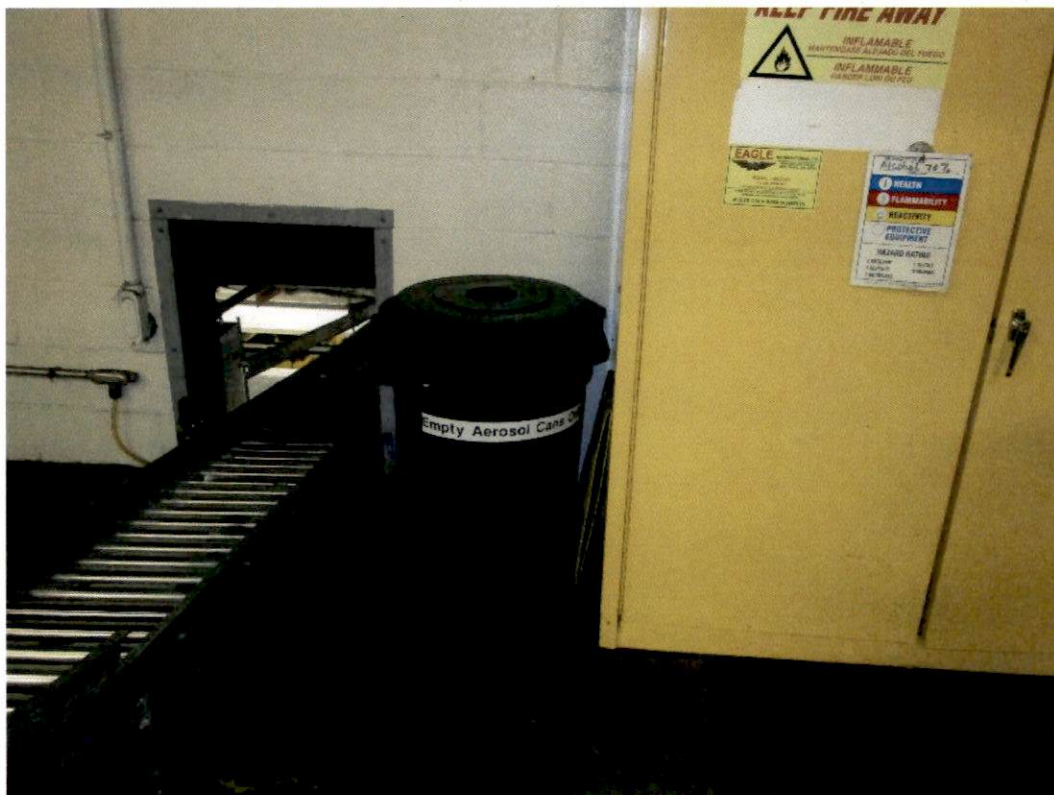


Photo #26: Plastic container in Packaging area with opening in lid

Photographic Log
Dial Corporation – PAD987271012
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Photo #23: Close-up of label on Photo #22 left drum



Photo #24: Additional label on Photo #23 drum

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #21: Flammables cabinet next to Packaging Lines



Photo #22: View inside Photo #21 cabinet (after getting key in Lab); right drum empty

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16



Photo #19: Full 1gal container (center left) with open funnel, under fume hood in Lab

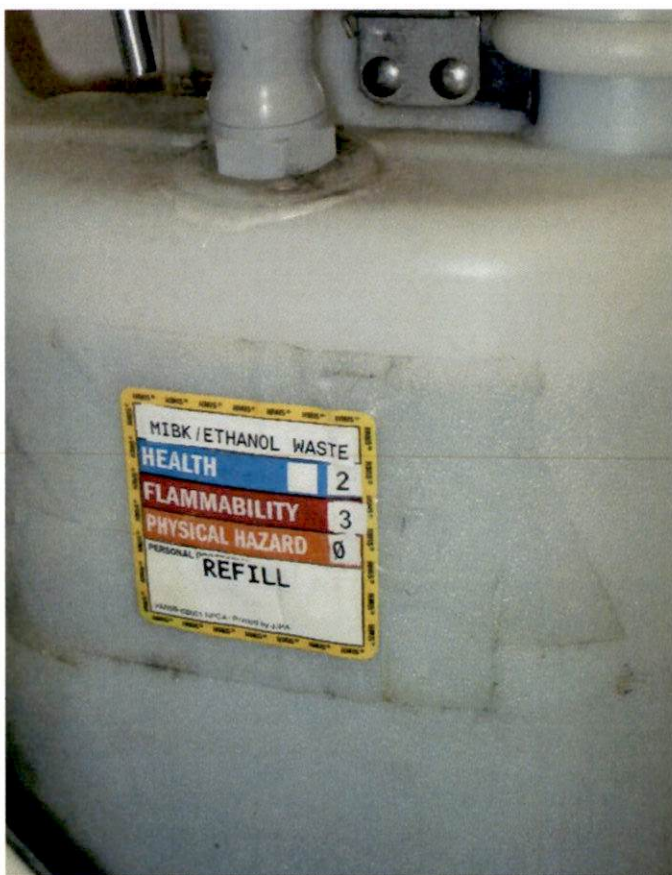


Photo #20: Close-up of label on Photo #19 1gal container

Photographic Log
Dial Corporation – PAD987271012
Inspection Date 5/17/16

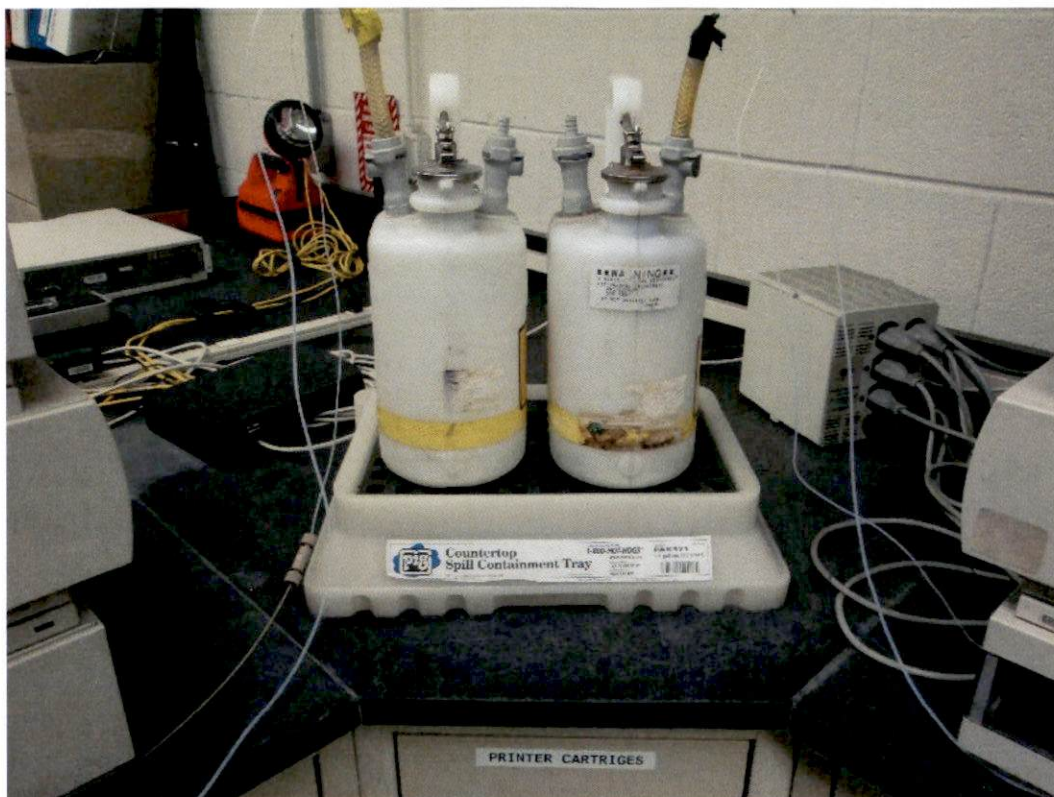


Photo #17: Two more 1gal containers in Lab connected to HPLCs



Photo #18: Back of Photo #17 containers, both labeled "LC Mobile Phase Waste"



SI-60 Series Ink

Safety Data Sheet

according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

Date of issue: 01/08/2015

Revision date: 06/11/2015

Version: 1.2

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product form : Mixture
Name : SI-60 Series Ink
Product code : SI-60
Synonyms : SI-60-T, SI-60-P, SI-60-55, SI-61 Red, SI-61-62 Blue, SI-63 Green, SI-64 Violet, SI-65 Yellow, SI-66 Brown, SI-69 Orange

1.2. Relevant identified uses of the substance or mixture and uses advised against

Use of the substance/mixture : Ink for printing processes

1.3. Details of the supplier of the safety data sheet

Squid Ink Manufacturing, Inc.
1173 Osborne Road
Spring Lake Park, MN 55432
United States of America

phone: 763-795-8856
fax: 763-795-8867
email: kschneider@squidink.com

1.4. Emergency telephone number

Country	Organization/Company	Address	Emergency number
MEXICO	Servicio de Informacion Toxicologica Sintox	Tintoreto #32 Edif. a Desp. Col. Nochebuena Mixcoac México, D.F.	1 800 009 2800 +52 55 5611 2634 /+52 55 5598 9095
UNITED STATES OF AMERICA	American Association of Poison Control Centers		1-800-222-1222

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification (GHS-US)

Skin Irrit. 2 H315
Eye Irrit. 2A H319

Full text of H-phrases: see section 16

2.2. Label elements

GHS-US labeling

Hazard pictograms (GHS-US)



GHS07

Signal word (GHS-US)

: Warning

Hazard statements (GHS-US)

: H315 - Causes skin irritation
H319 - Causes serious eye irritation

Precautionary statements (GHS-US)

: P264 - Wash hands thoroughly after handling
P280 - Wear eye protection, face protection, protective clothing, protective gloves
P302+P352 - If on skin: Wash with plenty of water
P305+P351+P338 - If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
P332+P313 - If skin irritation occurs: Get medical advice/attention
P337+P313 - If eye irritation persists: Get medical advice/attention
P362 - Take off contaminated clothing and wash before reuse

2.3. Other hazards

No additional information available

SI-60 Series Ink

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according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

2.4. Unknown acute toxicity (GHS-US)

Not applicable

SECTION 3: Composition/information on ingredients

3.1. Substance

Not applicable

3.2. Mixture

Name	Product identifier	%	Classification (GHS-US)
ethylene glycol monobutyl ether	(CAS No) 111-76-2	1 - 15	Flam. Liq. 4, H227 Acute Tox. 4 (Oral), H302 Acute Tox. 4 (Dermal), H312 Acute Tox. 4 (Inhalation), H332 Skin Irrit. 2, H315 Eye Irrit. 2A, H319
Alkanolamine	(CAS No) NJTS RN 254504001-5144	< 5	Not classified

Full text of H-phrases: see section 16

SECTION 4: First aid measures

4.1. Description of first aid measures

First-aid measures general	: Never give anything by mouth to an unconscious person. If you feel unwell, seek medical advice (show the label where possible).
First-aid measures after inhalation	: Allow victim to breathe fresh air. Allow the victim to rest.
First-aid measures after skin contact	: Wash with plenty of soap and water. Wash contaminated clothing before reuse. If skin irritation occurs: Get medical advice/attention.
First-aid measures after eye contact	: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.
First-aid measures after ingestion	: Rinse mouth. Do NOT induce vomiting. Obtain emergency medical attention.

4.2. Most important symptoms and effects, both acute and delayed

Symptoms/injuries after skin contact	: Causes skin irritation.
Symptoms/injuries after eye contact	: Causes serious eye irritation.

4.3. Indication of any immediate medical attention and special treatment needed

Treat symptomatically.

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media	: Foam. Dry powder. Carbon dioxide. Water spray. Sand.
Unsuitable extinguishing media	: Do not use a heavy water stream.

5.2. Special hazards arising from the substance or mixture

No additional information available

5.3. Advice for firefighters

Firefighting instructions	: Use water spray or fog for cooling exposed containers. Exercise caution when fighting any chemical fire. Prevent fire-fighting water from entering environment.
Protection during firefighting	: Do not enter fire area without proper protective equipment, including respiratory protection.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

6.1.1. For non-emergency personnel

Emergency procedures	: Evacuate unnecessary personnel.
----------------------	-----------------------------------

6.1.2. For emergency responders

Protective equipment	: Equip cleanup crew with proper protection.
Emergency procedures	: Ventilate area.

6.2. Environmental precautions

Prevent entry to sewers and public waters. Notify authorities if liquid enters sewers or public waters.

6.3. Methods and material for containment and cleaning up

Methods for cleaning up	: Soak up spills with inert solids, such as clay or diatomaceous earth as soon as possible. Collect spillage. Store away from other materials.
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SI-60 Series Ink

Safety Data Sheet

according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

6.4. Reference to other sections

See Heading 8. Exposure controls and personal protection.

SECTION 7: Handling and storage

7.1. Precautions for safe handling

- Precautions for safe handling : Wash hands and other exposed areas with mild soap and water before eating, drinking or smoking and when leaving work. Provide good ventilation in process area to prevent formation of vapor.
- Hygiene measures : Wash skin thoroughly after handling.

7.2. Conditions for safe storage, including any incompatibilities

- Storage conditions : Keep container closed when not in use. Keep only in the original container in a cool, well ventilated place away from : Direct sunlight, Heat-ignition.
- Incompatible products : Strong bases. Strong acids.
- Incompatible materials : Sources of ignition. Direct sunlight.

7.3. Specific end use(s)

No additional information available

SECTION 8: Exposure controls/personal protection

8.1. Control parameters

SI-60 Series Ink		
ACGIH	Not applicable	
OSHA	Not applicable	
ethylene glycol monobutyl ether (111-76-2)		
ACGIH	ACGIH TWA (ppm)	20 ppm
ACGIH	ACGIH STEL (ppm)	20 ppm
ACGIH	Remark (ACGIH)	Eye & URT irr
OSHA	OSHA PEL (TWA) (mg/m³)	240 mg/m³
OSHA	OSHA PEL (TWA) (ppm)	50 ppm
Alkanolamine (NJTS RN 254504001-5144)		
ACGIH	ACGIH TWA (mg/m³)	5 mg/m³
OSHA	Not applicable	

8.2. Exposure controls

- Appropriate engineering controls : Provide adequate general and local exhaust ventilation.
- Personal protective equipment : Protective clothing. Protective goggles. Gloves. Avoid all unnecessary exposure.



- Hand protection : Wear protective gloves.
- Eye protection : Chemical goggles or safety glasses.
- Skin and body protection : Wear suitable protective clothing.
- Respiratory protection : Where exposure through inhalation may occur from use, respiratory protection equipment is recommended.
- Other information : Do not eat, drink or smoke during use.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

- Physical state : Liquid
- Color : Coloured - See Product Specification
- Odor : Slight;characteristic
- Odor threshold : No data available

SI-60 Series Ink

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pH	: 4 - 10
Relative evaporation rate (butyl acetate=1)	: No data available
Melting point	: No data available
Freezing point	: No data available
Boiling point	: 100 °C
Flash point	: > 93 °C
Auto-ignition temperature	: No data available
Decomposition temperature	: No data available
Flammability (solid, gas)	: No data available
Vapor pressure	: No data available
Relative vapor density at 20 °C	: No data available
Relative density	: No data available
Solubility	: Soluble in water. Water: Solubility in water of component(s) of the mixture : • 2-butoxyethanol, ethylene glycol monobutyl ether, butyl cellosolve:
Log Pow	: No data available
Log Kow	: No data available
Viscosity, kinematic	: No data available
Viscosity, dynamic	: No data available
Explosive properties	: No data available
Oxidizing properties	: No data available
Explosive limits	: No data available

9.2. Other information

No additional information available

SECTION 10: Stability and reactivity

10.1. Reactivity

No additional information available

10.2. Chemical stability

Not established.

10.3. Possibility of hazardous reactions

Not established.

10.4. Conditions to avoid

Direct sunlight. Extremely high or low temperatures.

10.5. Incompatible materials

Strong acids. Strong bases.

10.6. Hazardous decomposition products

Fume. Carbon monoxide. Carbon dioxide.

SECTION 11: Toxicological information

11.1. Information on toxicological effects

Acute toxicity	: Not classified (Based on available data, the classification criteria are not met)
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ethylene glycol monobutyl ether (111-76-2)	
LD50 oral rat	1746 mg/kg body weight (Rat; Equivalent or similar to OECD 401; Experimental value)
LD50 dermal rat	> 2000 mg/kg body weight (Rat; Experimental value; OECD 402: Acute Dermal Toxicity)
LC50 inhalation rat (mg/l)	2,2 mg/l/4h (Rat; Experimental value)
LC50 inhalation rat (ppm)	450 ppm/4h (Rat; Experimental value)
ATE US (oral)	1746,000 mg/kg body weight
ATE US (dermal)	1100,000 mg/kg body weight
ATE US (gases)	450,000 ppmV/4h

SI-60 Series Ink

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according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

ethylene glycol monobutyl ether (111-76-2)	
ATE US (vapors)	2,200 mg/l/4h
ATE US (dust, mist)	2,200 mg/l/4h
Alkanolamine (NJTS RN 254504001-5144)	
LD50 oral rat	8680 mg/kg
LD50 dermal rabbit	> 20000 mg/kg
ATE US (oral)	8680,000 mg/kg body weight
Skin corrosion/irritation	: Causes skin irritation. pH: 4 - 10
Serious eye damage/irritation	: Causes serious eye irritation. pH: 4 - 10
Respiratory or skin sensitization	: Not classified (Based on available data, the classification criteria are not met)
Germ cell mutagenicity	: Not classified (Based on available data, the classification criteria are not met)
Carcinogenicity	: Not classified (Based on available data, the classification criteria are not met)

ethylene glycol monobutyl ether (111-76-2)	
IARC group	3 - Not classifiable
Reproductive toxicity	: Not classified (Based on available data, the classification criteria are not met)
Specific target organ toxicity (single exposure)	: Not classified (Based on available data, the classification criteria are not met)
Specific target organ toxicity (repeated exposure)	: Not classified (Based on available data, the classification criteria are not met)
Aspiration hazard	: Not classified (Based on available data, the classification criteria are not met)
Potential Adverse human health effects and symptoms	: Based on available data, the classification criteria are not met.
Symptoms/injuries after skin contact	: Causes skin irritation.
Symptoms/injuries after eye contact	: Causes serious eye irritation.

SECTION 12: Ecological information

12.1. Toxicity

ethylene glycol monobutyl ether (111-76-2)	
LC50 fish 1	1474 ppm (96 h; Oncorhynchus mykiss)
EC50 Daphnia 1	1550 mg/l (48 h; Daphnia magna)
Threshold limit algae 1	911 mg/l (72 h; Pseudokirchneriella subcapitata)
Threshold limit algae 2	88 mg/l (72 h; Pseudokirchneriella subcapitata)

12.2. Persistence and degradability

SI-60 Series Ink	
Persistence and degradability	Not established.
ethylene glycol monobutyl ether (111-76-2)	
Persistence and degradability	Readily biodegradable in water. Low potential for adsorption in soil. Photooxidation in the air.

12.3. Bioaccumulative potential

SI-60 Series Ink	
Bioaccumulative potential	Not established.
ethylene glycol monobutyl ether (111-76-2)	
Log Pow	0,81 (Test data; 20 °C)

SI-60 Series Ink

Safety Data Sheet

according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

ethylene glycol monobutyl ether (111-76-2)	
Bioaccumulative potential	Low bioaccumulation potential (Log Kow < 4).

12.4. Mobility in soil

ethylene glycol monobutyl ether (111-76-2)	
Surface tension	0,065 N/m (20 °C; 003)

12.5. Other adverse effects

Effect on ozone layer	:
Effect on the global warming	: No known ecological damage caused by this product.
Other information	: Avoid release to the environment.

SECTION 13: Disposal considerations

13.1. Waste treatment methods

Waste disposal recommendations	: Dispose in a safe manner in accordance with local/national regulations.
Ecology - waste materials	: Avoid release to the environment.

SECTION 14: Transport information

In accordance with DOT
Not dangerous goods in terms of transport regulations

Additional information

Other information	: No supplementary information available.
-------------------	---

ADR

No additional information available

Transport by sea

No additional information available

Air transport

No additional information available

SECTION 15: Regulatory information

15.1. US Federal regulations

ethylene glycol monobutyl ether (111-76-2)	
Listed on the United States TSCA (Toxic Substances Control Act) inventory	

15.2. International regulations

CANADA

No additional information available

EU-Regulations

No additional information available

Classification according to Regulation (EC) No. 1272/2008 [CLP]

Skin Irrit. 2 H315

Eye Irrit. 2 H319

Full text of H-phrases: see section 16

Classification according to Directive 67/548/EEC [DSD] or 1999/45/EC [DPD]

Not classified

15.2.2. National regulations

:

15.3. US State regulations

SI-60 Series Ink

Safety Data Sheet

according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

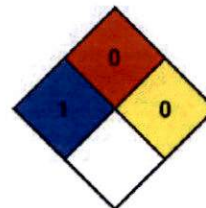
SECTION 16: Other information

Revision date : 06/11/2015
Other information : None.

Full text of H-phrases:

Acute Tox. 4 (Dermal)	Acute toxicity (dermal) Category 4
Acute Tox. 4 (Inhalation)	Acute toxicity (inhalation) Category 4
Acute Tox. 4 (Oral)	Acute toxicity (oral) Category 4
Eye Irrit. 2A	Serious eye damage/eye irritation Category 2A
Flam. Liq. 4	Flammable liquids Category 4
Skin Irrit. 2	Skin corrosion/irritation Category 2
H227	Combustible liquid
H302	Harmful if swallowed
H312	Harmful in contact with skin
H315	Causes skin irritation
H319	Causes serious eye irritation
H332	Harmful if inhaled

NFPA health hazard : 1 - Exposure could cause irritation but only minor residual injury even if no treatment is given.
NFPA fire hazard : 0 - Materials that will not burn.
NFPA reactivity : 0 - Normally stable, even under fire exposure conditions, and are not reactive with water.



HMIS III Rating

Health : 1 Slight Hazard - Irritation or minor reversible injury possible
Flammability : 0 Minimal Hazard
Physical : 0 Minimal Hazard
Personal Protection : C

SDS US (GHS HazCom 2012)

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Material Safety Data Sheet
acc. to ISO/DIS 11014

Page 1/6

04/18/2012

Revision date: 04/18/2012

1 Identification of the substance/mixture and of the company/undertaking

- **Product identifier**
- **Trade name:** **INK, TWP**
All Variations
- **Application of the substance / the preparation** Printing inks
- **Details of the supplier of the safety data sheet**
- **Manufacturer/Supplier:**
Diagraph an ITW Company
Marking and Coding Division
1 Missouri Research Park Drive
St. Charles, MO 63304-5685 USA
(800) 526-2531 USA
(636) 300-2000 [Outside USA]
(636) 300-2005 FAX
- www.diagraph.com
- **Information Department:** msds@diagraphmsp.com
- **Emergency telephone number:**
Contact Infotrac: (800) 535 5053 (US only)
International: +1 352 323 3500

2 Composition/information on ingredients

- **Chemical characterization:** Mixtures
- **Description:** Mixture of the substances listed below with nonhazardous additions.

· **Dangerous components:**

111-46-6 Diethylene glycol	5-20%
----------------------------	-------

3 Hazards identification

- **Classification of the substance or mixture**
- **Classification according to Directive 67/548/EEC or Directive 1999/45/EC** not applicable
- **Classification system:**
The classification was made according to the latest editions of international substances lists, and expanded upon from company and literature data.
- **Label elements**
- **Labelling according to EU guidelines:**
Observe the general safety regulations when handling chemicals
The product is not subject to identification regulations according to directives on hazardous materials.
- **Safety phrases:**
Do not empty into drains.
- **Classification system**
- **NFPA Ratings (scale 0-4)**



Health = 1
Fire = 1
Reactivity = 0

(Contd. on page 2)

USA

Material Safety Data Sheet

acc. to ISO/DIS 11014

04/18/2012

Revision date: 04/18/2012

Trade name: **INK, TWP**
All Variations

(Contd. of page 1)

· **HMIS Rating (scale 0-4)**



Health - 1

Flammability - 1

Reactivity - 0

- **Routes of Entry** Ingestion
- **Target Organs** None known
- **Irritancy** None known
- **Sensitizing Capability** None known
- **Reproductive Effects** None known
- **Cancer Information** Not known to be carcinogenic.

4 First aid measures

- **General information** No special measures required.
- **After inhalation** Supply fresh air; consult doctor in case of complaints.
- **After skin contact** Generally the product does not irritate the skin.
- **After eye contact** Rinse opened eye for several minutes under running water. Then consult a doctor.
- **After swallowing**
If swallowed, do not induce vomiting; seek medical advice immediately and show this container or label

5 Firefighting measures

- **Suitable extinguishing agents** Use fire fighting measures that suit the environment.
- **Special hazards arising from the substance or mixture** No further relevant information available.
- **Protective equipment:** No special measures required.

6 Accidental release measures

- **Personal precautions, protective equipment and emergency procedures** Not required.
- **Environmental precautions:**
Do not allow product to reach sewage system or any water course.
Inform respective authorities in case of seepage into water course or sewage system.
- **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
- **Reference to other sections** No dangerous substances are released.

7 Handling and storage

- **Handling**
- **Precautions for safe handling**
Wear chemical resistant goggles and gloves when handling.
Wash hands thoroughly after handling.
- **Information about protection against explosions and fires:** No special measures required.
- **Storage**
- **Requirements to be met by storerooms and receptacles:** No special requirements.
- **Information about storage in one common storage facility:** Not required.
- **Further information about storage conditions:** None.
- **Maximum storage temperature:** 120 F (49 C)
- **Minimum storage temperature** 35 F (2 C)

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Trade name: **INK, TWP**
All Variations

· **Specific end use(s)** No further relevant information available.

(Contd. of page 2)

8 Exposure controls/personal protection

· **Additional information about design of technical systems:** No further data; see item 7.

· **Components with limit values that require monitoring at the workplace:**

111-46-6 Diethylene glycol

WEEL 10 mg/m³

· **Personal protective equipment**

· **General protective and hygienic measures**

The usual precautionary measures for handling chemicals should be followed.

· **Breathing equipment:** Not required.

· **Protection of hands:**



Protective gloves.

· **Material of gloves**

Butyl rubber, BR

Nitrile rubber, NBR

Natural rubber, NR

PVA gloves

Neoprene gloves

· **Penetration time of glove material**

The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.

· **Not suitable are gloves made of the following materials:**

PVC gloves

Leather gloves

· **Eye protection:** Goggles recommended during refilling.

9 Physical and chemical properties

· **General Information**

· **Appearance:**

Form:

Liquid

Color:

According to product specification

· **Odor:**

Characteristic

· **Change in condition**

Melting point/Melting range: undetermined

Boiling point/Boiling range: 100°C (212 °F)

· **Flash point:**

146°C (295 °F)

· **Ignition temperature:**

225.0°C (437 °F)

· **Auto igniting:**

Product is not selfigniting.

· **Danger of explosion:**

Product does not present an explosion hazard.

· **Explosion limits:**

Lower:

0.7 Vol %

Upper:

22.0 Vol %

· **Vapor pressure at 20°C (68 °F):** 23.0 hPa (17 mm Hg)

(Contd. on page 4)

— USA —

Material Safety Data Sheet

acc. to ISO/DIS 11014

04/18/2012

Revision date: 04/18/2012

Trade name: **INK, TWP**
All Variations

(Contd. of page 3)

· Density at 20°C (68 °F):	1.014 g/cm ³ (8.462 lbs/gal)
· Solubility in / Miscibility with Water:	Fully miscible
· Solvent content:	
Organic solvents:	2 - 15 %
Water:	70 - 100 %
· Solids content:	0 - 20 %
· Other information	No further relevant information available.

10 Stability and reactivity

- **Thermal decomposition / conditions to be avoided:**
 No decomposition if used according to specifications.
- **Incompatible materials:** No further relevant information available.
- **Hazardous decomposition products:** No dangerous decomposition products known

11 Toxicological information

- **Acute toxicity:**
- **Primary irritant effect:**
- **on the skin:** No irritant effect.
- **on the eye:** No irritating effect.
- **Sensitization:** No sensitizing effects known.
- **Additional toxicological information:**
 The product is not subject to classification according to internally approved calculation methods for preparations:
 When used and handled according to specifications, the product does not have any harmful effects according to our experience and the information provided to us.

12 Ecological information

- **Aquatic toxicity:** No further relevant information available.
- **Persistence and degradability** No further relevant information available.
- **Behavior in environmental systems:**
- **Bioaccumulative potential** No further relevant information available.
- **Additional ecological information:**
- **General notes:**
 Water hazard class 1 (Self-assessment): slightly hazardous for water.
 Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.

13 Disposal considerations

- **Waste treatment methods**
- **Recommendation** Comply with all Federal, State, and Local regulations regarding disposal.
- **Uncleaned packagings:**
- **Recommendation:**
 Disposal must be made according to official regulations.

(Contd. on page 5)

USA

Material Safety Data Sheet

acc. to ISO/DIS 11014

04/18/2012

Revision date: 04/18/2012

Trade name: INK, TWP
All Variations

Comply with all Federal, State, and Local regulations regarding disposal.

(Contd. of page 4)

14 Transport information

· UN-Number	
· DOT, ADR, ADN, IMDG, IATA	Void
· UN proper shipping name	
· DOT, ADR, ADN, IMDG, IATA	Void
· Transport hazard class(es)	
· DOT	
· Class	Void Non-regulated Material
· ADR, ADN, IMDG, IATA	
· Class	Void
· Packing group	
· DOT, ADR, IMDG, IATA	Void
· Environmental hazards:	
· Marine pollutant:	No
· Special precautions for user	Not applicable.
· Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not applicable.

15 Regulatory information

· Cancerogenity categories
· EPA (Environmental Protection Agency)
None of the ingredients is listed.
· IARC (International Agency for Research on Cancer)
None of the ingredients is listed.
· NTP (National Toxicology Program)
None of the ingredients is listed.
· TLV (Threshold Limit Value established by ACGIH)
None of the ingredients is listed
· MAK (German Maximum Workplace Concentration)
None of the ingredients is listed.
· NIOSH-Ca (National Institute for Occupational Safety and Health)
All ingredients are listed
· OSHA-Ca (Occupational Safety & Health Administration)
All ingredients are listed.

· **Product related hazard information:**

Observe the general safety regulations when handling chemicals

The product is not subject to identification regulations according to directives on hazardous materials.

· **Safety phrases:**

Do not empty into drains.

(Contd. on page 6)

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Material Safety Data Sheet

acc. to ISO/DIS 11014

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Trade name: INK, TWP
All Variations

(Contd. of page 5)

- **National regulations**

- **Other regulations, limitations and prohibitive regulations**

- **OSHA Regulations**

Air Contaminant (29 CFR 1910.1000, Table Z-1, Z-1-A): Not listed

OSHA Specifically Regulated Substance (29 CFR 1910.): Not listed

- **Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III, Section 313:**

This product does not contain chemicals listed as toxic chemicals at levels which require reporting under SARA Title III Section 313.

- **CONEG:**

TWP-101 Black, TWP-1 and TWP-GB Black

This product meets CONEG and RoHS legislation for low levels of Lead, Cadmium, Mercury, Hexavalent Chrome, and Brominated flame retardants.

All other variations.

This product has not been tested for heavy metals covered under the various CONEG laws. However, raw materials used to make this product do not contain mercury, lead, cadmium, or hexavalent chromium and none are added during manufacture.

- **Toxic Substances Control Act TSCA Status:**

All components of this product are listed in the EPA's Inventory of Chemical Substances as required under the Toxic Substances Control Act (TSCA).

- **California Proposition 65 (Chemicals known to cause cancer):**

This product contains no ingredients on the California Proposition 65 List known to cause cancer.

- **California Proposition 65 (Chemicals known to cause reproductive toxicity):**

This product contains no ingredients on the California Proposition 65 known to cause reproductive toxicity.

16 Other information

This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.

- **File: 318**

- **Revision Information (All previous revisions obsolete):**

Current: 04-18-2012 Combined All TWP inks into one due to formulation changes.

Combined TWP-101, TWP-2, TWP-GB, TWP-WR; Section 1: Removed Product Numbers; Section 9, Added Solvent, Water and Solid content Section 15: Updated CONEG, RoHS and Prop 65

Previous Revision: 11-3-05 Reviewed and released with no additional changes.

Previous Revision: 2/18/2005 Corrected the stock number.

Previous revision: 04/25/2002 Updated Company Info. Combined like products.

USA

755 RLS 5/17/16
Attachment C

Safety Data Sheet



Revision Number: 000.0

Issue date: 01/25/2016

1. IDENTIFICATION OF THE SUBSTANCE OR MIXTURE AND OF THE SUPPLIER

Product identifier used on the label: Sodium Laureth Sulfate 7EO

Other means of identification: 2030954

Recommended use of the chemical and restrictions on use: Raw material intermediate, This product is for industrial use only

Name, address and telephone number of the chemical manufacturer:

The Dial Corporation, a Henkel Company
7201 E. Henkel Way
Scottsdale AZ 85255

CHEMTREC: 1-800-424-9300 (24 hours daily)

Internet: www.henkelna.com

Emergency telephone number: Medical Emergencies: 1-888-689-9082

2. HAZARDS IDENTIFICATION

Classification of the substance or mixture in accordance with paragraph (d) of §1910.1200

HAZARD CLASS	HAZARD CATEGORY
SKIN IRRITATION	2
EYE IRRITATION	1
CHRONIC HAZARDS TO THE AQUATIC ENVIRONMENT	3
ACUTE HAZARDS TO THE AQUATIC ENVIRONMENT	3

Signal word, hazard statement(s), symbol(s) and precautionary statement(s) in accordance with paragraph (f) of §1910.1200

Signal word: DANGER

Hazard Statement(s):

Causes skin irritation.

Causes serious eye damage.

Harmful to aquatic life with long lasting effects.

Symbol(s):



Precautionary Statements:

Prevention:

Wash thoroughly after handling.
Avoid release to the environment.
Wear eye and face protection.
Wear protective gloves.

Response:

IF ON SKIN: Wash with plenty of water.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
If skin irritation occurs: Get medical attention.
If eye irritation persists: Get medical attention.
Take off contaminated clothing.

Storage:

Not prescribed

Disposal:

Dispose of contents and/or container according to Federal, State/Provincial and local governmental regulations.

Hazards not otherwise classified:

Not available.

RS Number: 543134

Classification complies with OSHA Hazard Communication Standard (29 CFR 1910.1200) and is consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

See Section 11 for additional toxicological information.

3. COMPOSITION / INFORMATION ON INGREDIENTS

The following chemicals are classified as health hazards in accordance with paragraph (d) of § 1910.1200.

Chemical Name*	CAS Number (Unique Identifier)	Concentration
Sodium lauryl sulfate, 7-EO	9004-82-4	60 - 100 %
Fatty alcohol ethoxylate C14-15 7EO	68951-67-7	1 - 5 %

*The specific chemical identity and/or exact percentage (concentration) of composition has been withheld because a trade secret is claimed in accordance with paragraph (i) of §1910.1200.

4. FIRST AID MEASURES

Description of necessary measures

Inhalation: Remove from exposure area to fresh air. Contact physician or local poison control center.
Skin contact: Rinse affected area with large amounts of water until no evidence of product remains. Get medical attention if irritation persists.
Eye contact: Rinse eyes with plenty of water until no evidence of product remains. Get medical attention if pain or irritation develops.
Ingestion: Dilution by rinsing the mouth and giving water or milk to drink is generally recommended. Contact physician or local poison control center.

Most important symptoms and effects, both acute and delayed

After eye contact: May cause moderate to severe irritation with possibility of corneal injury if not removed promptly. After skin contact: Repeated or prolonged excessive exposure may cause irritation or dermatitis. After ingestion: Nausea and possible vomiting may occur. After inhalation: Unlikely to occur due to the physical properties of the product. At elevated temperatures, vapors or mists may cause irritation.

Indication of any immediate medical attention and special treatment needed

After eye contact: Rinse eyes with plenty of water until no evidence of product remains. After skin contact: Rinse affected area with mild soap and water until no evidence of product remains. After ingestion: Dilution by rinsing the mouth and giving a glass of water to drink is generally recommended. After inhalation: Remove from exposure area to fresh air.

5. FIRE FIGHTING MEASURES

Suitable (and unsuitable) extinguishing media

Suitable extinguishing media: Dry chemical, carbon dioxide, water spray or regular foam.
Unsuitable extinguishing media: None known

Specific hazards arising from the chemical

Oxides of carbon and oxides of nitrogen.

Special protective equipment and precautions for fire-fighters

In case of fire, wear a full-face positive-pressure self-contained breathing apparatus and protective suit. Shut off all ignition sources. Move containers from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Use flooding amounts of water as a fog, solid streams may be ineffective. Avoid breathing hazardous vapors, keep upwind.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Wear skin, eye and respiratory protection as recommended in Section 8. Stop leak if you can do it without risk. Spills present a slipping hazard. Keep unnecessary personnel away. Ventilate spill area if possible. Make sure area is slip-free before re-opening to traffic.

Environmental precautions

Small or household quantities may be disposed in regular domestic trash. For larger quantities check with your local disposal authorities.

Methods and materials for containment and cleaning up

SMALL SPILLS: Contain and absorb with sand or other absorbent material and place into clean, dry containers for later disposal. Wash site of spillage thoroughly with water. LARGE SPILLS: Dike far ahead of spill to prevent further movement. Recover by pumping or by using a suitable absorbent material and place into containers for later disposal. Dispose in suitable waste container.

7. HANDLING AND STORAGE

Precautions for safe handling

Do not get in eyes. Do not take internally. Use with adequate ventilation. Avoid generating aerosols and mists.

Conditions for safe storage, including any incompatibilities

Store in original containers in a cool dry area. Storage areas for large quantities (warehouse) should be well ventilated. Keep the containers tightly closed when not in use.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

OSHA permissible exposure limit (PEL), American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the safety data sheet, where available.

Hazardous Component(s)	ACGIH TLV	OSHA PEL	AIHA WEEL	OTHER
None	None	None	None	None

Appropriate engineering controls

Provide local exhaust or general dilution ventilation to keep exposure to airborne contaminants below the permissible exposure limits where mists or vapors may be generated.

Individual protection measures

Respiratory:	Air contamination monitoring should be carried out where mists or vapors are likely to be generated, to assure that the employees are not exposed to airborne contaminants above the permissible exposure limits.
Eye:	Splash-proof safety glasses are required to prevent eye contact where splashing of product may occur.
Hand/Body:	Protective gloves are required where repeated or prolonged skin contact may occur. Protective clothing is required where repeated or prolonged skin contact may occur.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	liquid
Odor:	white to light yellow
Odor threshold:	characteristic
pH:	Not available.
Melting point/ range:	10.0 - 12.3 (25 °C)
Boiling point/range:	Not available.
Flash point:	100 °C (212 °F)
Evaporation rate:	> 93.4 °C (> 200.12 °F)
Flammable/Explosive limits - lower:	Not available.
Flammable/Explosive limits - upper:	Not available.
Vapor pressure:	Not available.
Vapor density:	Not available.
Solubility in water:	Soluble
Partition coefficient (n-octanol/water):	Not available.
Autoignition temperature:	Not available.
Decomposition temperature:	Not available.
Viscosity:	10,000 - 20,000 cps
VOC content:	Not available.
Specific gravity:	1.00 - 1.02

10. STABILITY AND REACTIVITY

Reactivity:	This product may react with aluminum and strong acids.
Chemical stability:	Stable under normal ambient temperature (70°F, 21°C) and pressure (1 atm).
Possibility of hazardous reactions:	Hazardous polymerization has not been reported to occur under normal temperatures and pressures.
Conditions to avoid:	Avoid storing in direct sunlight and avoid extremes of temperature.
Incompatible materials:	Aluminum, strong oxidizers and strong acids
Hazardous decomposition products:	Thermal decomposition may release toxic and/or hazardous gases, including ammonia.

11. TOXICOLOGICAL INFORMATION

Likely routes of exposure including symptoms related to characteristics

Inhalation:	Unlikely to occur due to the physical properties of the product. At elevated temperatures, vapors or mists may cause irritation.
Skin contact:	Repeated or prolonged excessive exposure may cause irritation or dermatitis.
Eye contact:	May cause moderate to severe irritation.
Ingestion:	May cause mild gastrointestinal irritation with nausea, vomiting, diarrhea and abdominal pain.
Physical/Chemical:	No physical/chemical hazards are anticipated for this product.
Other relevant toxicity information:	None available.
Acute oral product toxicity:	LD 50 (Rat) > 2,000 mg/kg

Numerical measures of toxicity, including delayed and immediate effect

Hazardous Component(s)	LD50s and LC50s	Immediate and Delayed Health Effects
Sodium lauryl sulfate, 7-EO	ORAL: 1,500 mg/kg (rat)	No Data
Fatty alcohol ethoxylate C14-15 7EO	DERMAL: >5,000 mg/kg (rat)	Irritant

Carcinogenicity information

Hazardous Component(s)	NTP Carcinogen	IARC Carcinogen	OSHA Carcinogen
Sodium lauryl sulfate, 7-EO	No	No	No
Fatty alcohol ethoxylate C14-15 7EO	No	No	No

Carcinogenicity	None of the ingredients in this product are listed as carcinogens by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP) or the Occupational Safety and Health Administration (OSHA).
Mutagenicity	None of the ingredients in this product are known to cause mutagenicity.
Toxicity for reproduction	None of the ingredients in this product are known as reproductive, fetal, or developmental hazards.

12. ECOLOGICAL INFORMATION

Aquatic Toxicity:

The following toxicity information is available for the hazardous ingredient(s) when used as technical grade and is provided as reference for the occupational settings.

Toxicity to fish:

Hazardous substances CAS-No.	Value type	Value	Acute Toxicity Study	Exposure time	Species	Method
Sodium lauryl sulfate, 7-EO 9004-82-4	LC50	39 mg/l	Fish	48 h	Leuciscus idus	DIN 38412-15

Toxicity to aquatic invertebrates:

Hazardous substances CAS-No.	Value type	Value	Acute Toxicity Study	Exposure time	Species	Method
Sodium lauryl sulfate, 7-EO 9004-82-4	EC50	2.43 – 4.01 mg/l	Daphnia	48 h	Ceriodaphnia dubia	NA

Toxicity to algae:

The toxicity to algae of this product has not been determined.

Persistence and degradability

Hazardous substances CAS-No.	Result value	Route of application	Species	Method
Sodium lauryl sulfate, 7-EO 9004-82-4	readily biodegradable	aerobic	89 %	OECD Guideline 301 D (Ready Biodegradability: Closed Bottle Test)

Bioaccumulative potential

The bioaccumulation potential of this product has not been determined.

Mobility in soil

The mobility of this product (in soil and water) has not been determined.

13. DISPOSAL CONSIDERATIONS**Description of waste residues:**

Hazardous waste number: Not regulated

Safe handling and disposal methods:

Recommended method of disposal: This product is not a RCRA hazardous waste and can be disposed of in accordance with federal, state and local regulations.

Disposal of uncleaned packages: Place in trash.

14. TRANSPORT INFORMATION

The information in this section is for reference only and should not take the place of a shipping paper (bill of lading) specific to an order. Please note that the proper shipping classification may vary by packaging, properties, and mode of transportation.

U.S. Department of Transportation Ground (49 CFR)

Proper shipping name: Not regulated
Hazard class or division: None
Identification number: None
Packing group: None

International Air Transportation (ICAO/IATA)

Proper shipping name: Not regulated
Hazard class or division: None
Identification number: None
Packing group: None

Water Transportation (IMO/IMDG)

Proper shipping name: Not regulated
Hazard class or division: None
Identification number: None
Packing group: None

15. REGULATORY INFORMATION

Occupational safety and health act: Hazard Communication Standard, 29 CFR 1910.1200(g) Appendix D: The Occupational Safety and Health Administration (OSHA) require that the Safety Data Sheets (SDSs) are readily accessible to employees for all hazardous chemicals in the workplace. Since the use pattern and exposure in the workplace are generally not consistent with those experienced by consumers, this SDS may contain health hazard information not relevant to consumer use.

United States Regulatory Information

TSCA 8 (b) Inventory Status: All components are listed or are exempt from listing on the Toxic Substances Control Act Inventory.
TSCA 12 (b) Export Notification: None above reporting de minimis

CERCLA/SARA Section 302 EHS: None above reporting de minimis
CERCLA/SARA Section 311/312: Not available.
CERCLA/SARA Section 313: None above reporting de minimis

California Proposition 65: No California Proposition 65 listed chemicals are known to be present.

Canada Regulatory Information

CEPA DSL/NDL Status: All components are listed on or are exempt from listing on the Canadian Domestic Substances List.

16. OTHER INFORMATION

DISCLAIMER: The data contained herein are furnished for information only and are believed to be reliable. However, Henkel Corporation and its affiliates ("Henkel") does not assume responsibility for any results obtained by persons over whose methods Henkel has no control. It is the user's responsibility to determine the suitability of Henkel's products or any production methods mentioned herein for a particular purpose, and to adopt such precautions as may be advisable for the protection of property and persons against any hazards that may be involved in the handling and use of any Henkel's products. In light of the foregoing, Henkel specifically disclaims all warranties, express or implied, including warranties of merchantability and fitness for a particular purpose, arising from sale or use of Henkel's products. Henkel further disclaims any liability for consequential or incidental damages of any kind, including lost profits.

This safety data sheet contains changes from the previous version in sections: New Safety Data Sheet format.

Prepared by: R&D Support Services

Issue date: 1/25/2016

SAFETY DATA SHEET

Date Prepared : 04/20/2015

SDS No : PROP-9903

CP-750

1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: CP-750

GENERAL USE: Clean process and research equipment in pharmaceutical, biotechnology and cosmetic industries.

PRODUCT DESCRIPTION: Alkaline Detergent

PRODUCT CODE: CP750

CHEMICAL FAMILY: Alkali/detergent blend

MANUFACTURER

Cani Manufacturing
1048 Stinson Drive
Reading, PA 19605

Customer Service: 800-548-4568

DISTRIBUTOR

Cani, Inc.
PO Box 1408
Skippack, PA 19474

Customer Service: 610-222-4500

24 HR. EMERGENCY TELEPHONE NUMBERS

CHEM-TEL (Medical and Transportation): 800-255-3924

POISON CONTROL CENTER (Medical): 800-222-1222

2. HAZARDS IDENTIFICATION

GHS CLASSIFICATIONS

Health:

Skin Corrosion, Category 1B

Eye Corrosion, Category 1

Acute Toxicity (Oral), Category 4

GHS LABEL



Corrosion



Exclamation
mark

SIGNAL WORD: DANGER

HAZARD STATEMENTS

H314: Causes severe skin burns and eye damage.

H302: Harmful if swallowed.

PRECAUTIONARY STATEMENT(S)

Prevention:

P280: Wear protective gloves/protective clothing/eye protection/face protection.

P261: Avoid breathing fume, mist, vapours or spray.

P264: Wash hands thoroughly after handling.

P270: Do not eat, drink or smoke when using this product.

P234: Keep only in original packaging.

P273: Avoid release to the environment.

Response:

P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P310: Immediately call a POISON CENTER or doctor/physician.

P302+P352: IF ON SKIN: Wash with plenty of soap and water.

P332+P313: If skin irritation occurs: Get medical advice/attention.
P362: Take off contaminated clothing.
P301+P312: IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell.
P330: Rinse mouth.
P331: Do NOT induce vomiting.
P304+P340: IF INHALED: Remove person to fresh air and keep comfortable for breathing.
P312: Call a POISON CENTER or doctor/physician if you feel unwell.

Storage:

P405: Store locked up.
P406: Store in a plastic container or corrosion resistant metal container with a resistant inner liner.

Disposal:

P501: Dispose of contents/container in accordance with all local, state and federal regulations.

EMERGENCY OVERVIEW

PHYSICAL APPEARANCE: Clear Liquid

IMMEDIATE CONCERNS: Causes irreversible eye damage and skin burns.

POTENTIAL HEALTH EFFECTS

EYES: Corrosive, contact causes severe eye burns.

SKIN: Corrosive, causes skin burning.

SKIN ABSORPTION: Not Established

INGESTION: Harmful if swallowed.

INHALATION: Mist is irritating to nose, throat and lungs.

REPRODUCTIVE TOXICITY

REPRODUCTIVE EFFECTS: No known significant effects or critical hazards.

TERATOGENIC EFFECTS: No known significant effects or critical hazards.

CARCINOGENICITY: No known significant effects or critical hazards.

MUTAGENICITY: No known significant effects or critical hazards.

ROUTES OF ENTRY: Eye, skin, ingestion.

CANCER STATEMENT: None

SENSITIZATION: No known significant effects or critical hazards.

WARNING CAUTION LABELS: Corrosive

PHYSICAL HAZARDS: May be corrosive to certain metals.

3. COMPOSITION / INFORMATION ON INGREDIENTS

Chemical Name	Wt. %	CAS
Potassium Hydroxide	20 - 30	1310-58-3
Tetrasodium ethylenediamine tetraacetate	1 - 5	64-02-8

4. FIRST AID MEASURES

EYES: Immediately flush eyes with water for at least 15 minutes, while holding eyelids open. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Seek medical attention immediately.

SKIN: Remove contaminated clothing. Immediately flush with water followed by washing with mild soap. Seek medical attention.

INGESTION: Get immediate medical attention. Do not induce vomiting unless instructed to do so by poison center or physician.

INHALATION: Remove victim to fresh air and monitor. Seek medical advice if irritation persists.

SIGNS AND SYMPTOMS OF OVEREXPOSURE

EYES: Severe burning sensation, damage marked by burns.

SKIN: Burning sensation, redness, swelling and possible blistering.

SKIN ABSORPTION: Not Established

INGESTION: Irritation of mouth, throat, along with stomach upset, vomiting.

INHALATION: Irritation of nose, throat and lungs with coughing, sneezing, possible difficulty breathing.

ACUTE TOXICITY: Corrosive to eyes and skin. Harmful if inhaled. Harmful if swallowed

NOTES TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

5. FIRE FIGHTING MEASURES

FLAMMABLE CLASS: None

EXTINGUISHING MEDIA: Use an extinguishing agent suitable for the surrounding fire.

EXPLOSION HAZARDS: None

FIRE FIGHTING PROCEDURES: Use an extinguishing agent suitable for surrounding fire.

FIRE FIGHTING EQUIPMENT: NA = Not Applicable

HAZARDOUS DECOMPOSITION PRODUCTS: Not Established

6. ACCIDENTAL RELEASE MEASURES

SMALL SPILL: Avoid runoff into storm sewers and ditches which lead to waterways.

LARGE SPILL: Avoid walking in material. Prevent product from entering into stream, soil, storm sewer or other bodies of water.

ENVIRONMENTAL PRECAUTIONS

WATER SPILL: Avoid discharges into open waterways.

LAND SPILL: Avoid discharge to soil.

AIR SPILL: NA = Not Applicable

GENERAL PROCEDURES: Isolate spill or leak area immediately. Keep unauthorized personnel away. Do not touch or walk through spilled material. Prevent entry into waterways, sewers, or confined areas. Absorb with dry earth, sand or other non-combustible material and transfer to containers.

RELEASE NOTES: Product may be harmful to aquatic life.

SPECIAL PROTECTIVE EQUIPMENT: Eye protection, rubber gloves, rubber boots to protect feet.

7. HANDLING AND STORAGE

GENERAL PROCEDURES: Close container after use.

HANDLING: Avoid contact with skin and eyes. Wash hands before eating, drinking, smoking or using toilet facilities.

STORAGE: Store only in original container. Do not reuse empty container. If a leaky container must be contained within another, mark the outer container to identify the contents. Store product away from food and water sources. Keep this product under locked storage sufficient to make it inaccessible to children or persons unfamiliar with its proper use.

STORAGE TEMPERATURE: Store at ambient temperatures.

STORAGE PRESSURE: Store at ambient atmospheric pressure.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

EXPOSURE GUIDELINES

OSHA HAZARDOUS COMPONENTS (29 CFR 1910.1200)					
		EXPOSURE LIMITS			
		OSHA PEL		ACGIH TLV	
Chemical Name		ppm	mg/m ³	ppm	mg/m ³
Potassium Hydroxide	TWA		2 mg/m3		
	STEL				2 mg/m3

ENGINEERING CONTROLS: No special requirements.

PERSONAL PROTECTIVE EQUIPMENT

EYES AND FACE: Chemical splash goggles and full face-shield.

SKIN: Rubber or other chemical resistant gloves.

RESPIRATORY: A respirator is not needed under normal and intended conditions of product use.

PROTECTIVE CLOTHING: Chemical resistant outerwear (tyvek) if contact with spray or mist is anticipated.

WORK HYGIENIC PRACTICES: Wash with soap and water after handling. Do not eat, drink or smoke while using product.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE: Liquid

ODOR: Characteristic.

ODOR THRESHOLD: Not Established

COLOR: Water Clear

pH: > 13.5

PERCENT VOLATILE: >75

FLASH POINT AND METHOD: None

FLAMMABLE LIMITS: N/A

AUTOIGNITION TEMPERATURE: NA = Not Applicable

VAPOR PRESSURE: ~ 20 mm Hg at 20°C (68°F)

VAPOR DENSITY: ~ 1 Air = 1

BOILING POINT: 212° F; 100° C

FREEZING POINT: 32° F; 0° C

MELTING POINT: NA = Not Applicable

THERMAL DECOMPOSITION: Not Available

SOLUBILITY IN WATER: Complete

EVAPORATION RATE: (Water =1) 1.0

DENSITY: ~ 10.73 at 20°C (68°F)

SPECIFIC GRAVITY: 1.25 to 1.300 grams/ml. at 20°C (68°F)

VISCOSITY: Water thin.

(VOC): None

10. STABILITY AND REACTIVITY

REACTIVITY: Stable

HAZARDOUS POLYMERIZATION: Will not occur.

STABILITY: Stable under normal storage and use conditions.

CONDITIONS TO AVOID: Reacts violently with strong acids.

POSSIBILITY OF HAZARDOUS REACTIONS: Reacts violently with strong inorganic acid materials.

HAZARDOUS DECOMPOSITION PRODUCTS: Under normal conditions of storage and use, hazardous decomposition products should not be produced.

INCOMPATIBLE MATERIALS: Strong acids, oxidizers.

11. TOXICOLOGICAL INFORMATION

ACUTE

Chemical Name	ORAL LD ₅₀ (rat)	DERMAL LD ₅₀ (rabbit)
Potassium Hydroxide	273 mg/kg (rat)	N/A
Tetrasodium ethylenediamine tetraacetate	3030 mg/kg (rat)	> 5000 mg/kg (rabbit)

EYES: Not Established

DERMAL LD₅₀: Not Established

ORAL LD₅₀: ~ 273 mg/kg Rat

INHALATION LC₅₀: Not Established

EYE EFFECTS: Corrosive to eyes. Permanent damage may occur.

SKIN EFFECTS: Corrosive to skin.

CARCINOGENICITY

IARC: No listed substance

IRRITATION: Irritant

CORROSIVITY: Corrosive

SENSITIZATION: No known significant effects or critical hazards.

NEUROTOXICITY: No known significant effects or critical hazards.

GENETIC EFFECTS: No known significant effects or critical hazards.

REPRODUCTIVE EFFECTS: No known significant effects or critical hazards.

TARGET ORGANS: No known significant effects or critical hazards.

TERATOGENIC EFFECTS: No known significant effects or critical hazards.

MUTAGENICITY: No known significant effects or critical hazards.

12. ECOLOGICAL INFORMATION

ENVIRONMENTAL DATA: Not Established

ECOTOXICOLOGICAL INFORMATION: This material is harmful to aquatic life.

DISTRIBUTION: Not Established

AQUATIC TOXICITY (ACUTE): Not Established

CHEMICAL FATE INFORMATION: Not Established

13. DISPOSAL CONSIDERATIONS

DISPOSAL METHOD: Any method in accordance with local, state and federal laws. Best method is to recycle or reuse for intended purpose. If discarded, this material and its containers should be treated as hazardous waste based on the characteristics of corrosivity as defined under federal RCRA regulations (40 CFR 261). Consult local authorities for disposal into public-sewer.

FOR LARGE SPILLS: Consult with local and state authorities for large volume disposal.

PRODUCT DISPOSAL: Any method in accordance with local, state, and federal laws. Best method is to recycle or reuse for intended purpose.

EMPTY CONTAINER: Rinse container with clear water. Offer container for recycling, or dispose of in trash.

RCRA/EPA WASTE INFORMATION: Corrosive

RCRA HAZARD CLASS: D002

14. TRANSPORT INFORMATION

DOT (DEPARTMENT OF TRANSPORTATION)

PROPER SHIPPING NAME: Compound, Cleaning Liquid

TECHNICAL NAME: Potassium Hydroxide Solution

PRIMARY HAZARD CLASS/DIVISION: 8

UN/NA NUMBER: 1760

PACKING GROUP: III

PLACARDS: Corrosive

LABEL: Certain package sizes determine the proper labeling of containers. Consult manufacturer for specific information regarding proper labeling.

OTHER SHIPPING INFORMATION: Certain shipping modes and packaging sizes may have exceptions from the transport regulations. The classifications/information provided above may not reflect applicable exceptions. Contact the manufacturer for more specific information on the proper shipping of this material.

U.S. CUSTOMS HARMONIZATION NUMBER: 3402.90.10.00

AIR (ICAO/IATA)

SHIPPING NAME: Corrosive liquid, basic, inorganic, n.o.s.

TECHNICAL NAME: Potassium Hydroxide Solution

UN/NA NUMBER: 3266

PRIMARY HAZARD CLASS/DIVISION: 8

PACKING GROUP: II

ERG: 8L

PLACARDS: Corrosive

LABEL: Corrosive

VESSEL (IMO/IMDG)

SHIPPING NAME: Corrosive liquid, basic, inorganic, n.o.s.

TECHNICAL NAME: Potassium Hydroxide Solution

UN/NA NUMBER: 3266

PRIMARY HAZARD CLASS/DIVISION: 8

PACKING GROUP: II

EmS: F-A,S-B

MARINE POLLUTANT #1: No

PLACARDS: Corrosive

LABEL: Corrosive

15. REGULATORY INFORMATION

UNITED STATES

DOT LABEL SYMBOL AND HAZARD CLASSIFICATION



Corrosive



Limited
Quantity
Ground

SARA TITLE III (SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT)

311/312 HAZARD CATEGORIES: Health Hazard - Acute; Reactivity Hazard

FIRE: No **PRESSURE GENERATING:** No **REACTIVITY:** Yes **ACUTE:** Yes **CHRONIC:** No

313 REPORTABLE INGREDIENTS: No listed substance

302/304 EMERGENCY PLANNING

EMERGENCY PLAN: No listed substance

CERCLA (COMPREHENSIVE RESPONSE, COMPENSATION, AND LIABILITY ACT)**CERCLA REGULATORY:** Potassium Hydroxide

Chemical Name	Wt. %	CERCLA RQ
Potassium Hydroxide	20 - 30	1,000

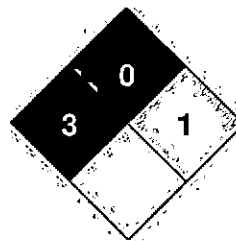
CERCLA RQ: 1000 lbs.

TSCA (TOXIC SUBSTANCE CONTROL ACT)**TSCA REGULATORY:** All ingredients are listed on the TSCA Chemical Inventory.**STATES WITH SPECIAL REQUIREMENTS**

Chemical Name	Requirements
Potassium Hydroxide	Massachusetts Right to Know Substance Pennsylvania Right to Know Substance New Jersey Right To Know Substance Rhode Island Right to Know Substance

CALIFORNIA PROPOSITION 65: No listed substance**CARCINOGEN:** No listed substance**16. OTHER INFORMATION****APPROVED BY:** Steve Weitzel **TITLE:** Vice President, Technical Operations**PREPARED BY:** Regulatory Affairs Department **Date Prepared:** 04/20/2015**HMIS RATING**

HEALTH	3
FLAMMABILITY	0
PHYSICAL HAZARD	1
PERSONAL PROTECTION	D

NFPA CODES

MANUFACTURER DISCLAIMER: This company cannot anticipate all conditions of handling and use of this product. Therefore, this company accepts no responsibility for results obtained by the application of this information, or the safety and suitability of the product either alone or in combination with other products. It is the responsibility of the employer and/or user to provide a safe workplace, using health and safety information contained herein as a guide. This company will accept no liability for damages or losses incurred from the improper handling and use of this product.

RES 5/17/16
Attachment E

Certificate

This is to certify that
Daniel Dule
Henkel Consumer Goods Inc
has successfully completed

Hazardous Waste Management: The Complete Course


in accordance with 40 CFR 265.16

presented by

Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com



Andy Smith, Instructor

June 3-4, 2013

Certificate Number: 128679

Certificate

This is to certify that
Dan Dule
Henkel Consumer Goods Inc.
has successfully completed

DOT Hazardous Materials Training

and has been trained and tested in General Awareness, Function-Specific, Safety, and Security
Awareness in accordance with the requirements of the US Department of Transportation at
49 CFR 172.702 and 49 CFR 172.704

presented by

Environmental Resource Center
101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com

Barry Gillespie

Barry Gillespie, Instructor

Employer

September 18, 2014

Certificate Number: 134585

Certificate

This is to certify that

Dan Dule

Henkel Consumer Goods Inc.
has successfully completed

Hazardous Waste Management: The Complete Course

in accordance with 40 CFR 265.16

presented by

Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com

Barry Gillespie

Barry Gillespie, Instructor

September 16-17, 2014

Certificate Number: 134585

Certificate

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Daniel Dule

Henkel Consumer Goods Inc

has successfully completed

Hazardous Waste Management:

The Complete Course

in accordance with 40 CFR 265.16

presented by:

Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com

Barry Gillespie

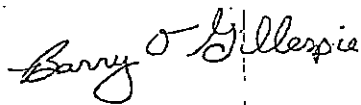
Barry Gillespie, Instructor

September 15-16, 2015

Certificate Number: 140323

Certificate

This is to certify that
Tony Swetz
The Dial Corporation, A HCGI Company
has successfully completed
**Hazardous Waste Management:
The Complete Course**
in accordance with 40 CFR 265.16
presented by
Environmental Resource Center
101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com



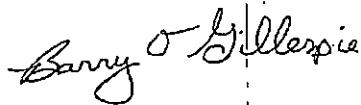
Barry Gillespie, Instructor

April 24-25, 2012

Certificate Number: 121830

Certificate

This is to certify that
Tony Swetz
The Dial Corporation, A HCGI Company
has successfully completed
DOT Hazardous Materials Training
and has been trained and tested in General Awareness, Function-Specific, Safety, and Security Awareness in
accordance with the requirements of the US Department of Transportation at
49 CFR 172.702 and 49 CFR 172.704
presented by
Environmental Resource Center
101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com



Barry Gillespie, Instructor

Employer

April 26, 2012

Certificate Number: 121830

Certificate

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Tony Swetz
Henkel Consumer Goods Inc.
has successfully completed

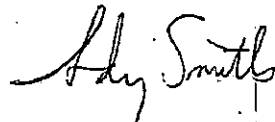
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www.ercweb.com



Andy Smith, Instructor

June 3-4, 2013

Certificate Number: 128680

Certificate

This is to certify that
Tony Swetz
Henkel Consumer Goods Inc.
has successfully completed

Hazardous Waste Management: The Complete Course

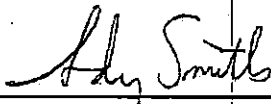
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Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com



Andy Smith, Instructor

June 2-3, 2014

Certificate Number: 133942

Certificate

This is to certify that
Tony Swetz
Henkel Consumer Goods Inc.
has successfully completed

DOT Hazardous Materials Training


and has been trained and tested in General Awareness, Function-Specific, Safety, and Security
Awareness in accordance with the requirements of the US Department of Transportation at
49 CFR 172.702 and 49 CFR 172.704

presented by

Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com


Andy Smith, Instructor

Employer

June 4, 2014

Certificate Number: 133942

Certificate

This is to certify that
Tony Swetz
Henkel Consumer Goods Inc.
has successfully completed

Hazardous Waste Management: The Complete Course

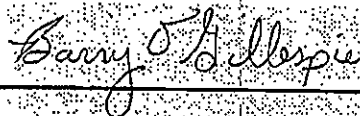
in accordance with 40 CFR 265.16

presented by

Environmental Resource Center

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

www.ercweb.com



Barry Gillespie, Instructor

September 15-16, 2015

Certificate Number: 140325

Emergency Response and Fire Prevention Plan



RLS 5/17/16
Attachment G

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Emergency Response and Fire Prevention Plan

1. Purpose

- 1.1 The purpose of this Emergency Response and Fire Prevention Plan (ERP) is to execute a formal, written plan in a coordinated effort to prevent and respond to emergency situations that may be encountered within or adjacent to Henkel Consumer Goods, Inc., 125 Jaycee Drive, West Hazleton, Luzerne County, Pennsylvania, 18202. This plan was written in accordance with OSHA Standard 1910 Subpart E, Exit routes, emergency action plans, and fire prevention plans.
- 1.2 Beyond the internal Henkel policy, the site is subject to state and federal requirements that pertain to the management of chemicals and emergency planning, among other things. Federal programs include the Clean Water Act (e.g. waste water discharge, oil pollution prevention, and storm water), the Clean Air Act (hazardous air pollutants), the Resource Conservation and Recovery Act – RCRA (hazardous waste), the Emergency Planning and Community Right-to-Know Act (hazardous/toxic chemicals) and the Comprehensive Environmental Response, Compensation and Liability Act- CERCLA (hazardous substances).
- 1.3 In addition to federal laws, PA DEP has also adopted standards and guidelines pertaining to releases of chemicals to the environment. The PA Clean Streams Law, Air Pollution Control Act, Solid Waste Management Act, Hazardous Sites Cleanup Act, Storage Tank Management and Spill Prevention Act all call for emergency planning to prevent releases to the environment.
- 1.4 By law, in addition to this ERP, the facility is required to have a Preparedness, Prevention and Contingency Plan (PPC). The site is not required to have a RCRA Contingency Plan, but this ERP addresses potential releases of hazardous wastes that would be covered under such a plan if it were required.

2. Scope

- 2.1 This procedure applies to all Henkel employees, contractors, vendors or service personnel. In any emergency situation, every effort will be made to protect all employees, visitors, contractors, neighboring businesses and residential areas surrounding the West Hazleton facility.
- 2.2 The Henkel Consumer Goods, Inc. (HCGI), West Hazleton Plant in the Valmont Industrial Park. The primary end products manufactured at this facility are consumer goods. The facility currently manufactures various blends of liquid laundry detergents, fabric softener, liquid hand soaps and body wash.

3. Responsibilities

- 3.1 **Plant Manager:** The role of the Plant Manager in an Emergency is to ensure all systems are in place to lead and authorize necessary emergency response, provide status updates to corporate and provide communications to the media, as appropriate.
- 3.2 **Plant Leadership Team/Crisis Management Team (PLT/CMT):** The role of the PLT/CMT is to control all incident-related activities including interfacing with the community, outside response organizations and/or regulatory agencies. This team has the authority to determine the short and long-term effects of the emergency, order the evacuation or shut-down of the facility, interface with outside organizations and the media, and issue press releases. Contact information listed in table 8.1.

- 3.2.1 Incident Command System (ICS): The ICS is led by the Plant Manager or Incident Commander (IC) who ensures all systems are in place to lead and authorize necessary emergency response. This system provides a coordinated response and a clear chain of command to ensure safe operations. The IC has the authority and capability to:

- 3.2.1.1 Assume command
- 3.2.1.2 Assess the situation
- 3.2.1.3 Determine response strategies
- 3.2.1.4 Activate resources
- 3.2.1.5 Order an evacuation or stay in place plan
- 3.2.1.6 Oversee the response activities
- 3.2.1.7 Declare that the incident is “over”

Emergency Response and Fire Prevention Plan

- 3.3 Safety, Health and Environmental (SHE) Resources:** The site's SHE Manager is responsible for:
- 3.3.1 Assisting the site PLT/CMT in preparing, communicating and maintaining records of pre-emergency plans, evacuation drills and other exercises related to the specific site scenarios. Contact information listed in Table 8.2.
 - 3.3.2 Developing and maintaining the facility's Emergency Response Plan. The plan is stored in HIMDOC.
- 3.4 Medical First Responder Team** consists of facility personnel from all shifts, who are trained in Adult CPR/AED/Standard First Aid at a minimum, and are responsible for providing initial treatment in the event of an emergency. All Medical First Responders are adequately trained for their intended job duties; properly equipped for the intended tasks and capable of responding in a safe manner. Contact information listed in Table 8.3.
- 3.5 Security Service:** The facility has a security service that is trained to provide assistance in emergency situations. In addition to providing general site security, the facility security personnel are responsible for:
- 3.5.1 Directing ambulance or emergency service to the appropriate area of the plant.
 - 3.5.2 In the event of an incidental chemical spill/release, the security service may be utilized to control traffic onto or off of the premises.
 - 3.5.3 In the event of a natural disaster, the security service personnel shall utilize the NOAA Weather Radio to stay informed and provide information to the PLT or SHE Manager, as needed.
 - 3.5.4 In the event of an evacuation, the security service shall remove all temporary, visitor and contractor logs from the guard's desk. The security service will supply the IC, PLT team, or other designated person, with the log books to ensure all temporary, visitor, and contractors are accounted for once a roll call is made.
- 3.6 All Employees:** At a minimum, all employees are responsible for:
- 3.6.1 Recognizing and reporting emergency situations to any Team Leader and/or any Manager.
 - 3.6.2 Warning other employees in the area of an injury or incidental chemical release and isolate the area, if appropriate.
 - 3.6.3 Taking appropriate security and safety measures to minimize exposure risks.
 - 3.6.4 Evacuate the facility in a safe and efficient manner when directed or proceed to the designated "stay in place" area.

4. Procedure

4.1 Reporting and Communication Procedure:

- 4.1.1 There are several means for reporting emergencies within the plant. In addition, communication plans are essential in reporting emergencies, warning personnel of hazards or dangers, coordinating response actions, evacuating the facility or stay in place and declaring an emergency over.
- 4.1.2 All employees, contractors, and temporary personnel are instructed in the procedures for reporting injuries/illnesses, unsafe conditions, and emergency situations upon initial assignment and annually thereafter. All employees are aware that full understanding of the procedures described in this ERP and the reporting requirements for emergency situations are a condition of employment.
 - 4.1.2.1 Internal Communication Systems. Depending on the type of emergency, employees may use the following means as way to communicate the emergency:
 - 4.1.2.1.1 Telephone public address (PA) system. A page may be made by dialing the Emergency Response Alarm 333 and the pound (#) key to summon the appropriate personnel to respond to the emergency. This number will override the paging system.
 - 4.1.2.1.2 Also a page may be made by dialing 340 and the pound (#) key or a person-to-person call can be made. A list of Emergency Response Team personnel is available in each area. **Note:** In addition, employees have access to a list of telephone extensions that is made available to each department.

Emergency Response and Fire Prevention Plan

- 4.1.2.1.3 There are several emergency pull stations, which are primarily for fire emergencies. The emergency pull stations are located near each exit door.
- 4.1.2.1.4 There are two-way radios available for use in the First Aid Room. The SHE Manager are responsible for the maintenance/upkeep of the radios, and have been instructed to correct and report all malfunctions.
- 4.1.2.1.5 General Emergency Data is shared and collected, including:
 - 4.1.2.1.5.1 Type of emergency
 - 4.1.2.1.5.2 Source
 - 4.1.2.1.5.3 Extent of emergency
 - 4.1.2.1.5.4 Actions taken
 - 4.1.2.1.5.5 Type of injuries
 - 4.1.2.1.5.6 Amount and type of chemical spill, release or fire
 - 4.1.2.1.5.7 Extent of damage
 - 4.1.2.1.5.8 Possible additional hazards to people, facility, and/or environment

4.1.3 External Communications:

- 4.1.3.1 The PLT will ensure that no unauthorized spokesperson shall communicate with the media or the public. Each employee, temporary employee, contractor or visitor of the facility shall be instructed that commenting or otherwise discussing a facility emergency with the media or any governmental official without express consent of the Plant Manager is prohibited.
- 4.1.3.2 The PLT and Managers of an affected emergency area may provide relevant factual information to Emergency Responders that is necessary to address an emergency, but shall prepare/maintain a record of such communication. These records shall be provided to the Plant Manager as soon as practicable.
- 4.1.3.3 The Plant Manager will discuss external communications with the Vice President of Operations and other corporate resources before providing any formal response. In order to ensure that an emergency is effectively abated, or as required by law, the Plant Manager shall have the discretion to provide informal responses to governmental officials and emergency responders, including medical providers without corporate approval, but shall prepare/maintain a record of such communication to be provided to the appropriate corporate officials as soon as possible. No media contact should be made without prior corporate approval.
- 4.1.3.4 In any potential emergency, the Plant Manager (IC or Alternate IC), in consultation with Plant Leadership Team (PLT) and/or SHE Manager shall make the determination of whether to send employees home; shut down the plant; shut down partial plant operations; direct to take shelter in place (remain indoors) or evacuate.

4.1.4 PLT/Management Communication: The Plant Manager and/or other PLT members must be contacted promptly of any facility emergencies.

-
- 4.1.4.1 If an "Emergency" situation occurs, the operational area/team manager (or their designated alternate) shall immediately report the incident that occurred to the appropriate PLT member of that area.
 - 4.1.4.2 The PLT member will contact the Plant Manager as soon as possible (but no longer than is necessary to enable responders to contain the immediate threat or 30 minutes, whichever is shorter).
 - 4.1.4.3 The Plant Manager will report the emergency to the Vice President of Operations and other corporate resources as soon as possible, but no longer than 8 hours after the onset of the Emergency.
 - 4.1.4.4 There may not be a manager available at certain times such as week-ends or holidays. In this case, the "manager on call" must be notified. The name of each manager on call is posted at the employee entrance to the facility. Where no management representative can be contacted or if an

Emergency Response and Fire Prevention Plan

employee does not know who to contact, employees may contact the Security Personnel to assist with proper notification.

- 4.1.4.5 If employees are sent home and the plant cannot operate, every effort will be made to contact employees working on the off/in-coming shift(s). If the Plant Manager, or designee, decides to close the plant, other means of communication in regards to plant closure(s) are listed in Table 8.4.

4.2 Evacuation Procedures

- 4.2.1 Each team member shall shut down his/her equipment (using stop button and then by pressing E-stop button). Team members should also isolate the area they work in by closing doors, windows, elevator shaft doors, etc. Each team member should exit the building without stopping for personal belongings. Team members shall exit in a calm but swift manner.
- 4.2.2 Once outside, all team members shall meet at the primary assembly area which is by the tree on the front lawn (if practical). Team members shall remain together throughout the evacuation (stay clear of the parking lot, curbing, incoming roads, etc. to allow access for emergency vehicles). In the event that conditions prevent assembly at the primary assembly area, employees will be directed to assemble at the secondary area which is the northeast end of the upper parking lot.
- 4.2.3 No smoking is permitted until the event is terminated.
- 4.2.4 Team Managers, or their designated back-ups, shall ensure that all of their team members are accounted for, and shall notify Security once the roll call is complete. Security and the Department Manager shall be notified immediately if someone is not accounted for. Security and Human Resources (if applicable) will coordinate temporary and contractor/visitor logs to ensure everyone from the building is accounted for.
- 4.2.5 In event of a severe storm, such as an electrical storm, team members may wait in their vehicles (once accounted for by their Manager) until the "All Clear" is given.
- 4.2.6 Trained personnel shall read the alarm panel located at the Employee Entrance or Front Office Entrance; determines cause/location of fire. When the alarm activates, it relays to external call center that will dispatch the local fire company.
- 4.2.7 First Responders shall be on hand to assist, if needed. In the event the ambulance or paramedics are needed, the emergency phone number is: 9-911
- 4.2.8 Team members (except authorized-trained personnel) shall not re-enter the plant until the "All-Clear" message has been given.
- 4.2.9 The following individuals will be responsible for communicating the emergency status and pertinent information to the Fire Department:

4.2.9.1 1st Shift: Technical Services Manager or the Designated Back-up

4.2.9.2 2nd and 3rd Shifts: Shift Manager or the Designated Back-up

4.2.10 ~~No one shall leave the premises until given further instructions by Management.~~

4.2.11 All evacuations, including drills, shall be treated as if a real emergency were taking place.

4.3 Shelter in Place Plan

- 4.3.1 If warned to take "Shelter in Place", a warning shall be broadcasted and all employees shall shut down his/her equipment (using stop button and then by pressing E-stop m members should also isolate the area they work in by closing doors, windows, elevator shaft doors, etc.
- 4.3.2 Each team member shall then report to the "Shelter in Place" designated area, identified on the 1st Floor, adjacent to Special Packs/Processing Break Rooms. In some instances, other Stay in Place Areas be authorized by the Crisis Management Team.
- 4.3.3 Team Managers, or their designated back-ups, shall ensure that all of their team members are accounted for, and shall notify Security once the roll call is complete. Security and the Department Manager shall be

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notified immediately if someone is not accounted for. Security and Human Resources (if applicable) will coordinate temporary and contractor / visitor logs to ensure everyone from the building is accounted for.

4.3.4 The length of time you are required to take shelter may be short, such as during a tornado warning, or long, such as during a winter storm or a pandemic. It is important that all team members stay in place until local authorities say it is safe to leave. Additionally, team members shall take turns listening to radio broadcasts and maintain a 24-hour safety watch.

4.3.5 The following PLT/CMT or designated person(s) will be responsible for communicating the emergency status and pertinent information to the Fire Department:

4.3.5.1 1st Shift: Technical Services Manager or their Designated Back-up

4.3.5.2 2nd and 3rd Shifts: Shift Manager or their Designated Back-up

4.3.6 All drills shall be treated as if a real emergency were taking place.

4.4 Potential Emergency Situations - This Emergency Response Plan addresses emergencies that can be reasonably expected in the workplace. A list of Emergency Response Equipment, PPE, Location and Inspection Frequency can be located in Table 9.1.

4.4.1 Fire/Explosion

4.4.1.1 Fires are often preventable. Because fires spread so quickly, they can be particularly deadly, becoming life threatening in two minutes and engulfing an area in as little as five minutes. Below are the potential fire hazards and fire prevention to ensure safety of the employees and site.

4.4.1.1.1 **In the event of a small fire**, employees may attempt to put out the fire ONLY in its beginning stage. All employees are trained annually in the use of fire extinguisher equipment.

4.4.1.1.2 Check to make sure the fire extinguisher is the proper class for the type of fire. If using a fire extinguisher, ensure that no one is behind the fire. Remove fire extinguisher from the wall, pull the pin, aim at the base of the flames and spray the fire with sweeping motion.

4.4.1.1.2.1 For fire extinguisher location, please refer to the fire extinguisher map and locations.

4.4.1.1.2.2 Notify affected employees and a manager immediately. The manager will report it to a PLT member to inform the fire department if necessary. The items that the fire department will be asking for are:

4.4.1.1.2.2.1 Exact location of fire.

4.4.1.1.2.2.2 Your name and company name.

4.4.1.1.2.2.3 Potential hazardous material involved and quantity, if applicable.

4.4.1.2 **In the event of a large fire**, employees shall:

4.4.1.2.1 Activate alarm upon discovery of smoke or fire, located at each exit door, upon hearing the fire alarm. Don't waste time gathering valuables or making a phone call. Once you're out of the building, don't go back in for any reason. If a door feels hot, do not open it. Do not open any doors except for the ones you can escape through, if safe to do so.

4.4.1.2.3 If there is smoke in the building, stay low to the ground as you exit to avoid inhaling potentially toxic fumes.

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- 4.4.1.3 **Smoking Policy:** Smoking is not allowed in the facility. There are designated smoking areas outside of the building, which are located away from all potential flammable and/or combustible materials.
 - 4.4.1.4 **Housekeeping:** Each Department in the plant is responsible for performing regular housekeeping inspections of their areas.
 - 4.4.1.5 **Maintenance of Systems:** The following personnel are responsible for the maintenance of the systems used for prevention and control of ignitions or fires, and fuel source hazards: Technical Services Manager and Facilities personnel.
 - 4.4.1.6 **Other Fire Prevention Systems:** Procedures for welding/cutting are established for all Henkel and non-Henkel contractor employees; refer to the Safe Work Permit Program.
 - 4.4.1.7 **Fire Prevention Systems Layout:** Automatic Sprinkler System, Emergency Pull Stations and Fire Extinguisher layout in the plant can be found on the Fire Emergency Response Equipment table below. An outside Security Monitoring System service performs a quarterly inspection test on the automatic sprinkler and alarm system. In addition, the Harrell Sprinkler Company inspects the sprinkle and PIV System annually. West Hazleton Fire Inspection is conducted annually. Property insurance company performs a building inspection. All recommendations for improvements from these inspections are considered. Below is a list of Fire Emergency Response Equipment, Locations and Inspection Frequency.
 - 4.4.1.8 In the event of an explosion, get to a safe area and immediately report it to a member of the Crisis Management Team immediately. If needed, use the emergency phone system (#333) to inform all employees to move away from the area and/or evacuate the hazardous area or plant.
 - 4.4.1.9 Power may soon go out immediately, if it hasn't already. Should this be the case, use of cell phone may be necessary to inform the Crisis Management Team.
 - 4.4.1.10 There may be a fire, smoke or dust and debris in the air. Breathe through a cloth (wet it first if you have time) as you make your way out of the building.
 - 4.4.1.11 When evacuating, close all doors and attempt to isolate the area.
 - 4.4.1.12 Remember the fire safety plan, and follow it accordingly to find an exit from the building.
 - 4.4.1.13 Pull the Fire Alarm, located at each exit door upon leaving the facility.
 - 4.4.1.14 If possible the team members should perform the following activities:
 - 4.4.1.14.1 Identify the hazardous materials involved so that appropriate corrective action can be taken.
 - 4.4.1.14.2 Remove ignition sources.
 - 4.4.1.14.3 Prevent the spread of the chemical or other hazardous materials.
- 4.4.2 **Incidental Chemical Spills/Releases:** This facility handles large quantities of substances used as raw materials, products, non-production chemicals and/or wastes in a variety of tanks, totes, drums, containers, bottles, pails, packages, etc. Henkel employees are trained to handle all materials in a manner that will avoid spillage. All chemical spills/releases must follow the Basic Spill Procedures listed below. Other actions will be determined based on whether the chemical spill/release is minor or major and whether it is internal or external. Generally, the level of action in response to a chemical spill/release will depend on factors such as the quantity/volume, type of chemical and potential impacts on environmental receptors.
- 4.4.2.1 Each of the following processes has been evaluated to plan for Chemical Spills/Releases through a Process Risk Assessment (PRA), which can be obtained from SHE Manager upon request:
- 4.4.2.1.1 Rewoquat (aka Esterquat) - unloading, storage, and dispensing
 - 4.4.2.1.2 Fragrance storage/dispensing systems
 - 4.4.2.1.3 Gas boiler and natural gas system
 - 4.4.2.1.4 Neutralization process; including storage
 - 4.4.2.1.5 Isopropyl Alcohol (70% and 99%) - storage, dispensing, and use
 - 4.4.2.1.6 Handling of Powders in BC Processing - Dust Explosion
 - 4.4.2.1.7 Handling Hydrogen Peroxide (Minncare)
 - 4.4.2.1.8 Flammable Storage

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- 4.4.2.2 Basic Spill Procedures:** In the event of any chemical spill/release, the personnel at the spill location must immediately report the incident to their team/area manager or designated person, the Environmental Coordinator and/or SHE Manager. A North America Incident Reporting Form is required to be completed and retained by the SHE Manager.
- 4.4.2.2.1** In no case shall any employee take actions that exceed the level of skill and training when considering the containment and clean-up of a Chemical Spill/Release.
- 4.4.2.2.2** If medical attention is needed, contact a member of the Medical First Responder Team to evaluate the employee. If necessary call 9-911. Medical surveillance requirements include recognition of symptoms and signs, which might indicate over exposure to hazards.
- 4.4.2.2.3** Disposal Considerations - All containers, supplies and/or controlled materials shall be disposed of in accordance with federal, state and local regulations. The team shall ensure the following is performed:
- 4.4.2.2.3.1** Label and store the drum in a safe, secure location, according to Waste Container Labeling Procedure, away from air conditioning intake points and lanes of traffic. Keep away from sources of ignition.
- 4.4.2.2.3.2** Place the container in accordance with Placing Waste in Storage Area Procedure. Contact the Environmental Coordinator to arrange for proper disposal through an approved chemical disposal company to remove the containers in accordance to local, state and federal regulations.
- 4.4.2.2.3.3** The Environmental Coordinator and appropriate personnel shall fill out required internal reports and take appropriate corrective actions to eliminate such a hazard from occurring in the future.
- 4.4.2.2.3.4** If the spill is reportable, the Environmental Coordinator will make the proper notifications to the Plant Leadership/Crisis Management Team and external agencies in accordance to local, state, and federal regulations.
- 4.4.2.3 Minor Chemical Spills/Releases** are those that involve twenty-five (25) gallons or less of non-hazardous chemicals, 10 gallons or less of hazardous chemicals or flammable materials (HMIS H3, F3 or GHS 1 or 2), one (1) gallon or less of toxic materials (GHS 1 or 2).
- 4.4.2.3.1** If the Team/Area Manager, or designated person, is able to immediately determine that the incident is a Minor Chemical Spill/Release, s/he can order immediate containment and clean-up by the appropriate personnel.
- 4.4.2.3.2** Refer to the Safety Data Sheet (SDS) or other references for information such as "Quick Guides" are available for most hazardous materials. In addition, the Emergency Response Guide Book shall be used to determine safe distances and places of refuge, if necessary.
- 4.4.2.3.3** Personal protective equipment and emergency equipment - Proper PPE is selected and worn based on the hazards. In addition proper supplies shall also be made available.
- 4.4.2.4 Major Chemical Spills/Releases** are any non-Minor chemical spills/releases that require levels of response that go beyond routine containment and clean-up may be reportable to Henkel, SHE.com and may be reportable to outside responders and/or governmental authorities.
- 4.4.2.4.1** If the Team/Area Manager finds that the release is a Major Chemical Spill/Release (or he/she cannot determine whether the incident is Minor), he/she shall immediately alert area occupants and isolate the area. If appropriate, Team/Area Manager, or designated person, shall take any other necessary actions to notify/evacuate other potentially affected employees from the impacted area, if necessary.

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- 4.4.2.4.2 The Team/Area Manager, or designated back-up, shall attempt to assess the magnitude, if safe to do so. This information, such as the location of the spill/release and the nature of the chemical, shall be immediately reported to a PLT member or SHE Manager to coordinate a rapid response.
- 4.4.2.5 **Internal Incidental Chemical Releases:** Incidents that occur entirely within the facility or containment walls are potentially dangerous to human health, but pose little threat to the outside environment or community.
 - 4.4.2.5.1 Internal Chemical Spills/Releases generally do not require reporting to governmental authorities, but may still require notifying outside responders. Internal Chemical Spills/Releases, whether Minor or Major, will typically be handled by the processing employees according to the Basic Spill Procedures.
 - 4.4.2.5.2 Internal chemical spills/releases which have been deemed too large or risky for internal resources to handle will be handled by external resources.
 - 4.4.2.5.3 Internal spills many occur in the following areas:
 - 4.4.2.5.3.1 Processing Area(s)
 - 4.4.2.5.3.2 Processing Tank Farm(s)
 - 4.4.2.5.3.3 Tanker Unloading Stations #1, #2, and #3
 - 4.4.2.5.3.4 Materials Services Dock
 - 4.4.2.5.3.5 Perfume Areas (Storage, Dispensing Room, and travel paths)
 - 4.4.2.5.3.6 Quality Assurance
- 4.4.2.6 **External Chemical Releases - Environmental Impacts:** The Henkel Corporate SHE standards require that each facility assess potential environmental impacts of its operations and take action to prevent contamination of the environment. Consistent with this mandate, the facility has developed this ERP and ensures that all employees are familiar with proper chemical handling and emergency procedures, and receive training relevant to their responsibilities on these and other SHE topics on a regular basis.
 - 4.4.2.6.1 For spills/releases of oil substances, follow procedures set forth in facility SPCC.
 - 4.4.2.6.2 For spills/releases of chemical substances outside secondary containment, follow procedures set forth in facility PPC/SWPPP.
 - 4.4.2.6.3 For Minor Chemical Spills/Releases or spills/releases within secondary containment, the following guidelines apply:
 - 4.4.2.6.3.1 Attempt to isolate and restrict work activities in the affected area to reduce possibilities of further contamination.
 - 4.4.2.6.3.2 Immediately notify the Environmental Coordinator and/or the SHE Manager.
 - 4.4.2.6.3.3 If possible, the area affected shall perform the following activities or contact outside responders:
 - 4.4.2.6.3.3.1 Identify hazardous materials or waste involved so that appropriate corrective action can be taken.
 - 4.4.2.6.3.3.2 Remove sources of ignition.
 - 4.4.2.6.3.3.3 If applicable, spread inert absorbent material over the entire affected area or surround the affected area with absorbent pillows or pads.
 - 4.4.2.6.3.3.4 Scoop up or collect absorbent material (and any affected media) and place it in a container for storage and disposal.

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4.4.2.6.3.3.5 Chemical Spill/Release clean-up material will be managed in accordance with the facility waste management procedures at the direction of the Environmental Coordinator and or Technical Services Manager.

4.4.2.6.3.5 The Environmental Coordinator will fill out required internal reports and work with the PLT to take appropriate corrective actions to eliminate such a hazard from occurring in the future.

4.4.2.6.3.6 If the spill/release exceeds a reportable quantity (see below), the Environmental Coordinator will make the proper notifications to the PLT. The PLT will then contact the Director of SHEQ to determine both internal reporting requirements and also notifications to external agencies in accordance with local, state, and federal regulations.

4.4.2.6.4 Should an external spill of any size occur, the Basic Spill Response procedures for Major Chemical Spills/Release shall be followed. Additional requirements for certain occurrences are described further.

4.4.2.6.5 Appropriate agencies must be contacted when the reportable quantity of the material is exceeded.

4.4.2.6.6 The report must include the following information:

4.4.2.6.6.1 The name, address and U.S. EPA Identification Number of the generator

4.4.2.6.6.2 Date, time, and type of incident (e.g., spill or fire).

4.4.2.6.6.3 Quantity and type of hazardous waste involved in the incident.

4.4.2.6.6.4 Extent of injuries, if any.

4.4.2.6.6.5 Estimated quantity and disposition of recovered materials, if any.

4.4.2.7 Hazmat Emergencies at Neighboring Properties:

4.4.2.7.1 If contacted by local emergency responders regarding a spill/release at an off-site property or road, the PLT shall determine necessary actions to take to ensure the safety of all employees, contract employees and/or visitors.

4.4.2.7.2 Once a plan has been determined, the PLT shall communicate emergency instructions including evacuation, shelter in place or use of personal protective equipment.

4.4.2.7.3 If directed to stay indoors or take stay-in-place, Area/Team Managers shall make sure to do the following:

4.4.2.7.3.1 Close all exterior doors and windows. Close as many vents and interior doors as possible.

4.4.2.7.3.2 Turn off air conditioners and ventilation systems; set ventilation systems to 100 percent recirculation so that no outside air is drawn into the building. If this is not possible, ventilation systems shall be turned off.

4.4.2.7.3.3 Employees will be directed to a selected shelter area, as defined by the nature of the emergency.

4.4.3 Unusual Waste Water Discharges

4.4.3.1 In the event of an "out of spec" result on waste water, the Quality Assurance (QA) Technician is required to contact the Processing Department immediately to stop the discharge to the Sewer Authority.

4.4.3.2 The QA Technician shall contact the Environmental Coordinator and/or Technical Services Manager immediately (for off shifts, contact information is available at the Security Guard Station).

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- 4.4.3.3 Once results have been confirmed, the Environmental Coordinator and/or Technical Services Manager shall determine if the severity warrants notifying the sewer authority in the event of an out of specification discharge.
- 4.4.4 **Minor, Moderate and Major Injury, Illness or Death:** The Medical First Responder Team is responsible for providing initial treatment in the event of an emergency.
 - 4.4.1.1 A Medical First Responder Team member shall be summoned and shall respond to all workplace injuries, whether minor, moderate or serious.
 - 4.4.1.2 Adequate First Aid Supplies and automated external defibrillator (AED) are readily available in each area.
 - 4.4.1.3 The First Responder shall assess the scene and the victim(s) prior to providing treatment.
 - 4.4.1.4 The First Responder will assess the need for further medical care and may request local emergency services (9)-911 for assistance, as appropriate.
 - 4.4.1.5 All injuries, no matter how minor, shall be reported immediately to the employee's Team Leader and/or any Manager.
 - 4.4.1.6 In the event an injury occurs during off-hours, such as a weekend or holiday, employees are instructed to contact the "Manager on Call" and the SHE Manager.
- 4.4.5 **Emergency Shutdown of PSM Equipment:** If an emergency condition occurs on or near the Esterquat (Rewoquat) system that may warrant an emergency response such as a breach in the pressurized storage tank or process piping, failure of interlocks or gauges, pump or seal failure, operating outside of defined safe operating limits, loss of communication with the PLC, uncontrolled heating, or fire. The team leader, technical specialists or other designated person is responsible for:
 - 4.4.5.1 Notifying the department managers and/or technical services manager. The technical specialist or assigned person must assess the situation in the immediate area.
 - 4.4.5.2 If there is immediate danger, hit the e-stops and evacuate the building as defined in this Emergency Response Plan.
 - 4.4.5.3 If no immediate danger is visible continue with the defined shutdown procedure.
- 4.4.6 **Utility Disruptions**
 - 4.4.6.1 **Power Outage:** In event of a power outage, employees shall immediately cease all operations, including forklift operations.
 - 4.4.6.1.1 Once it is safe to do so, employees shall immediately report to their designated area (cafeteria, break room or office area).
 - 4.4.6.1.2 The Team/Area Manager, or designated person, shall account for all employees and shall ensure everyone's safety (no injuries, equipment damage, etc.).
 - 4.4.6.2 **Natural Gas Leak:** Natural gas is a combustible mixture of hydrocarbon gases and in its pure form it is colorless, shapeless, and odorless. The characteristic "rotten egg" odor is actually an odorant added by the utility company called mercaptan and is added as an aid in detecting leaks.
 - 4.4.6.2.1 **Small Leak:** If you suspect a small natural gas leak proceed as follows:
 - 4.4.6.2.1.1 Open all doors and windows.
 - 4.4.6.2.1.2 Call the utility company and follow their directions.
 - 4.4.6.2.2 **Large Leak:** If the gas odor is strong and suspect a possible significant natural gas leak proceed as follows:
 - 4.4.6.2.2.1 Evacuate the building (by pulling any fire alarm as you exit).
 - 4.4.6.2.2.2 Call the utility company and follow their directions. Do not re-enter the building or return to the area until the utility company says it is safe.

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- 4.4.6.2.2.3 Due to the type of gas which is leaking, employees are prohibited from smoking.
- 4.4.6.2.2.4 Encourage employees to stay away from the leak (stay upwind).
- 4.4.6.2.2.5 Do not operate any electrical or mechanical devices (including phones or computers).
- 4.4.6.2.2.6 Do not start any vehicles.

4.4.7 Workplace Violence

4.4.7.1 Bomb Threats: In the event of a telephone bomb threat, the site will follow the Bomb Threat Procedure and utilize the checklist in order to obtain as much information as possible.

- 4.4.7.1.1 Every threat shall be considered serious, whether written or verbal.
- 4.4.7.1.2 An evacuation of the plant and grounds shall be activated, and the threat shall be investigated thoroughly via local law enforcement agencies.
- 4.4.7.1.3 The plant and grounds shall not be re-entered by unauthorized personnel until the appropriate officials have given the "all clear".

4.4.7.2 Chemical/Biological/Dirty Bomb: Every effort will be made to protect people within the facility.

- 4.4.7.2.1 All employees shall meet in the auditorium and ventilation systems shall be turned off immediately.
- 4.4.7.2.2 Use of various media equipment (radio, television, emergency broadcast radio, etc.) shall be used, if available, to allow for instruction from authorities on whether to evacuate or stay in place.
- 4.4.7.2.3 Adequate food, water and toiletries shall be provided.

4.4.7.3 Wrongful or Dangerous Acts of Violence in the Workplace: In the event of a dangerous or wrongful act of violence in the workplace,

- 4.4.7.3.1 Take protective cover and stay away from windows and doors until notified otherwise.
- 4.4.7.3.2 If possible, exit the building immediately and notify/inform anyone you encounter as you exit.
- 4.4.7.3.3 If you are directly involved in an incident and exiting the building is not possible, the following actions are recommended:

- 4.4.7.3.3.1 Go to the nearest room or office.
- 4.4.7.3.3.2 Close and lock the door.
- 4.4.7.3.3.3 Turn off the lights.
- 4.4.7.3.3.4 Seek protective cover.
- 4.4.7.3.3.5 Keep quiet and act as if no one is in the room.
- 4.4.7.3.3.6 DO NOT ANSWER THE DOOR!
- 4.4.7.3.3.7 If possible call 9-911 if safe to do so, provide the dispatcher with the following information:

- 4.4.7.3.3.7.1 Your name
- 4.4.7.3.3.7.2 Your location (be specific as possible)
- 4.4.7.3.3.7.3 Number of suspects (if known)
- 4.4.7.3.3.7.4 Identification or description of suspect
- 4.4.7.3.3.7.5 Injuries, if known

4.4.7.3.3.8 For less severe misconduct, all employees are encouraged to report any signs of a wrongful act or violence immediately to his/her manager.

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- 4.4.7.3.3.9 The manager shall report it to a member of the Plant Leadership Team (PLT).
- 4.4.7.3.3.10 The PLT member will decide the next steps such as calling security or the Police Department, if necessary.
- 4.4.7.3.3.11 If the police department is notified, ensure you have all necessary information:
 - 4.4.7.3.3.11.1 Person's Name
 - 4.4.7.3.3.11.2 Description of the individual
 - 4.4.7.3.3.11.3 Last known location of the individual
 - 4.4.7.3.3.11.4 Person's home address, if known
 - 4.4.7.3.3.11.5 What the person did to warrant the call
 - 4.4.7.3.3.11.6 Listing of any damage that occurred

4.4.7.4 Threats to Employees, Employee's Families or Facility

- 4.4.7.4.1 In the event of a threat to an employee, an employee's family or the facility, a manager should be notified immediately.
- 4.4.7.4.2 Security shall be notified and shall increase security services and/or roving patrol.
- 4.4.7.4.3 The manager will report it to a member of the Plant Emergency Team (PLT Member).
- 4.4.7.4.4 The manager will then call the Police Department if necessary.
 - 4.4.7.4.3.1 Name of employee who received the call.
 - 4.4.7.4.3.2 What words were spoken.
 - 4.4.7.4.3.3 What/who were threatened.
 - 4.4.7.4.3.4 What may have provoked the threat.
- 4.4.7.4.5 A call must be made to HENKEL legal department to advise them that a threat was made.

4.4.7.5 Sabotage and Social Disruptions: In the event of a riot, demonstration, or sabotage occurs, every effort shall be made by the PLT to protect people and property.

- 4.4.7.5.1 Local law enforcement agencies shall be summoned as necessary.
- 4.4.7.5.2 An attempt to keep the riot, mob, etc. from violating safety rules, causing injury or threat to life and health, and damaging property shall be made.

4.4.8 Weather Related Emergencies - In event of a plant weather emergency, the Human Resource Manager or Designated Back-Up will be responsible for maintaining weather updates from the National Weather Service or National Oceanic and Atmospheric Association (NOAA).

- 4.4.8.1 **Winter Storms:** A major danger associated with winter storms is their ability to knock out heat, power and communications, sometimes for days at a time.
 - 4.8.1.1.1 Winter storms include a variety of weather, including snow or subfreezing temperatures, strong winds, ice or heavy rain storms.
 - 4.8.1.1.2 The Facilities Team shall ensure that snow removal on both the grounds and roof structure(s) is sufficient.
 - 4.8.1.1.3 It is important to understand the basic winter weather terminology so you will know what the danger is and how to respond appropriately.

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Winter Storms	
Winter Storm Watch	A winter storm is possible in your area. Tune in to NOAA Weather Radio, commercial radio, or television for more information.
Winter Storm Warning	A winter storm is occurring or will soon occur in your area.
Blizzard Warning	Sustained winds or frequent gusts to 35 miles per hour or greater and considerable amounts of falling or blowing snow (reducing visibility to less than a quarter mile) are expected to prevail for a period of three hours or longer.
Blizzard	Winds over 35 mph with snow and blowing snow reducing visibility to near zero.

4.4.8.2 **Tornadoes:** Nature's most violent storms, can appear suddenly and without warning- even remaining invisible until dust and debris are picked up or a funnel cloud appears.

- 4.4.8.2.1 All employees shall seek refuge on the lower floor of the building.
- 4.4.8.2.2 Stay away from windows, doors and outside walls. Go to the center of the room. Stay away from corners because they attract debris.
- 4.4.8.2.3 Know the difference between a Tornado Watch and a Tornado Warning. Tornado Watch means conditions are favorable for tornadoes in and close to the watch area. Tornado Warning means a tornado has been detected by Doppler Radar and/or has been sighted.

Tornado Watch	Tornado Warning
Conditions are favorable for tornadoes in and close to the watch area.	A tornado has been detected by Doppler Radar and/or has been sighted.

4.4.8.3 **Thunderstorms** bring dangerous lightning, one of the leading causes of weather-related deaths in the United States each year. Other dangers associated with thunderstorms include tornadoes, strong winds, hail and flash flooding, which is responsible for more fatalities than any other thunderstorm-associated hazard.

- 4.4.8.3.1 Stay inside - rubber-soled shoes and rubber tires provide NO protection from lightning.
- 4.4.8.3.2 Cordless and cellular telephones are safe to use. Use a corded telephone only for emergencies.
- 4.4.8.3.3 The Engineering Manager will ensure that all structural and/or property damage is repaired in a timely fashion, such that no one is placed in danger of injury/loss.
- 4.4.8.3.4 Listen for weather updates from local officials.
- 4.4.8.3.5 Know the difference between a Thunderstorm Watch and a Thunderstorm Warning.

Thunderstorm Watch	Thunderstorm Warning
There is a possibility of a thunderstorm in your area.	A thunderstorm is occurring or will likely occur soon. If you are advised to take shelter, do so immediately.

Emergency Response and Fire Prevention Plan

4.4.8.4 **Flash Flooding** is not common to the site, however employees should be aware of flooding that may occur outside the immediate area.

4.4.8.4.1 Go to high ground immediately.

4.4.8.4.2 Stay out of areas subject to flooding. This includes dips, low spots, streams, etc.

4.4.8.4.3 Avoid already flooded and high velocity flow areas.

4.4.8.4.4 Never drive through flooded areas or standing water.

Flash Flood Watch	A Flash Flood Warning
Flooding is possible along small streams and rivers. Tune in to NOAA Weather Radio, commercial radio, or television for information.	Flooding is occurring or will occur soon; if advised to evacuate, do so immediately.

4.5 **Site Plan:** The facility site plan and layout are available from Security Personnel or SHE Manager. The facility layout will assist emergency personnel, if needed.

4.6 **Evacuation Maps and Procedures:** Evacuation Maps for each Department in the plant are posted throughout the facility. Employees receive annual training on the Emergency Response Procedures and Evacuation Routes.

4.7 **Plan Renewal:** This Emergency Response Plan and all supporting plans shall be revised as appropriate. The Plan will be reviewed with the Plant Leadership/Crisis Management Team and Medical Response Teams initially or whenever the plan changes. These plans will then be communicated to the plant teams. The plan is available at the guard station, Human Resources main office area or electronically.

5. Training

5.1 The PLT shall ensure that emergency training on the requirements of this plan and any other identified emergencies is given to appropriate personnel / teams on initial assignment and at least on an annual basis thereafter. The scope and content of the training shall be re-assessed and revised as appropriate on an as-needed basis. The Plan Administrators and SHE Manager are responsible for developing the materials required for emergency training in addition to maintaining appropriate records.

6. Definition(s) of an Emergency

- 6.1 Admittance to the hospital of three (3) or more plant employees per incident, or a single (1) fatality (per OSHA regulations)
- 6.2 An accident or natural disaster such as a flood, earthquake, equipment failure, or structural collapse that interrupts or is likely to interrupt production for at least four (4) hours and causes evacuation of the plant.
- 6.3 Release into the environment of a chemical substance or product, including any hazardous material or substance that affects or is likely to affect people or the environment beyond Henkel, West Hazleton property, or meets the hazardous substance reporting thresholds established by the Environmental Protection Agency (EPA) and PADEP.

Emergency Response and Fire Prevention Plan

7. Primary Emergency Telephone Numbers/Agencies

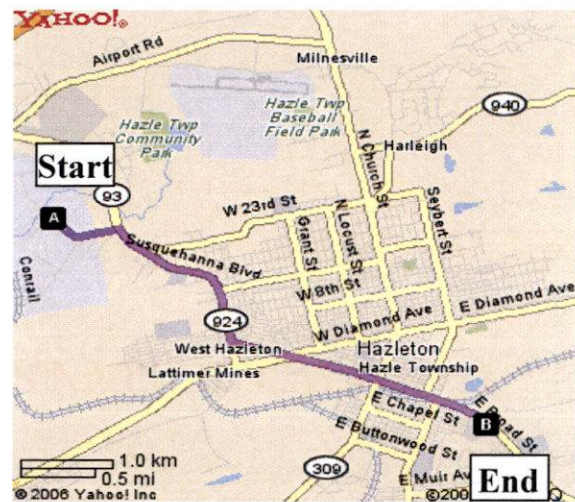
EMERGENCIES OF SERIOUS NATURE CALL 9-911

Medical Services: Lehigh Valley Health Network - Hazleton ER should be used for emergency services for any severe injuries or illnesses that are life threatening, serious in nature or if the other treating clinics are not open at the time of the injury or illness. The hospital is approximately 4 miles (approx. 7 min) from the plant, and is located:

Lehigh Valley Health Network - Hazleton ER

Emergency and After Hours 5:00pm - 8:30am
700 East Broad Street
Hazleton, PA 18201
(570) 501-6800

1. Turn **LEFT** onto Jaycee Drive (.2 miles).
2. Bear **LEFT** onto Deer Run Road (.3 miles).
3. Turn **RIGHT** onto Route 93 South at signal light by Arby's. Stay on 93 South (**bearing LEFT** onto Broad Street) through

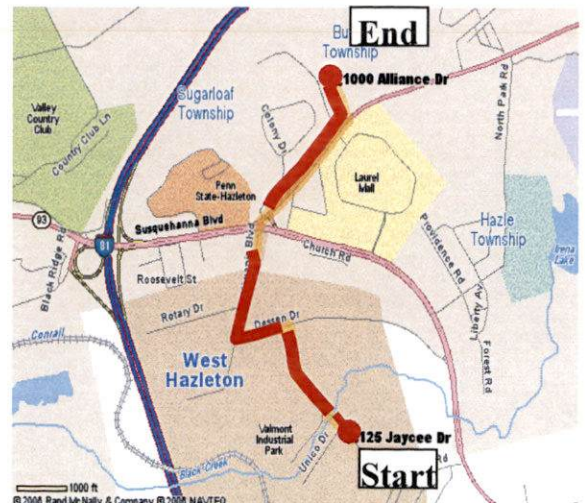


The **Lehigh Valley Occupational Health Services, Health and Wellness Center** should be used for non-emergency services that are not life threatening or serious in nature. The Occupational Health Services is located approximately 1.6 miles (approx. 5 min) from the plant, and is located at:

Lehigh Valley Occupational Health Clinic

Hazleton Health and Wellness Center
Hours: 8:30am – 5:00pm
50 Moisey Drive, Suite 208
Hazleton, PA 18202
(570) 501-4000

1. Turn **RIGHT** onto Jaycee Drive (.4 miles).
2. Turn **LEFT** onto Dessen Drive (.1 miles).
3. Turn **RIGHT** onto Kiwanis Boulevard (.3 miles).
4. Go forward at the light, crossing over Route 93 onto Airport Road



Emergency Response and Fire Prevention Plan

Corporate SHEQ Contacts:

Kimberly Newton - Production Steering NA. (480) 371-0239
Peter Crayton - Director of SHEQ. (480) 754-3440
Daniel Luitjens - Corporate Security. (480) 754-3667
Mobile: (480) 241-6501

Corporate Communications

Cindy Demers - Vice President Corporate Communications. (480) 754-4090
Natalie Violi - Director Corporate Communications. (480) 754-5442
Brad Gazaway - Vice President and General Counsel. (480) 754-5748

West Hazleton Fire Department. (570) 455-3696

12 South 4th Street
West Hazleton, PA 18202

West Hazleton Police Department. (570) 455-3733

West Hazleton Borough
12 South 4th Street
West Hazleton, PA 18202

Pennsylvania State Police. (570) 459-3890

250 Dessen Drive
West Hazleton, PA 18202

Veolia Environmental Services – Emergency Response HAZMAT. (973) 347-7111

1 Eden Lane
Flanders, NJ 07836
OR (800) 426-2382

Luzerne County Emergency Management Agency. (570) 820-4400

EMA Coordinator

168 Water Street, Wilkes-Barre, PA 18711
Luzerne County 24-Hour Non-Emergency. (570) 270-6911

CHEMTREC. (800) 424-9300

Chemical Transportation Emergency Center
Washington, D.C

Hazleton City Water Authority. (570) 454-2401

400 E. Gardner Parkway
Hazleton, PA 18201

Greater Hazleton Joint Sewer Authority. (570) 454-0851

Valmont Industrial Park
West Hazleton, PA 18202

PPL Utilities (Electric Company) 24-Hour Emergency Service. (800) 342-5775

UGI UTILITIES (Gas Company). (800) 276-2722

EPA (Environmental Protection Agency) - Hotline. (800) 438-2474

TSCA (Toxic Substance Control Act) - Hotline. (800) 438-2474

US EPA, Region 03 (Permitting Authority for Pennsylvania). (215) 814-5790

EPA (Environmental Protection Agency) Water Protection Division. (215) 814-2300

US EPA Region 3

1650 Arch Street
Philadelphia, PA 19103-2029

Emergency Response and Fire Prevention Plan

DEP (Department of Environmental Protection) - Northeast Regional Office.(570) 826-2511
In Case of an Environmental Emergency (24 hours a day).(570) 826-2511
2 Public Square
Wilkes-Barre, PA 18711-0790 Fax: (570) 830-3051

DEP (Department of Environmental Protection) - Main Business Number.(215) 814-5000
Mid Atlantic Region or (800) 438-2474
US EPA Region 3
1650 Arch Street (3PM52)
Philadelphia, PA 19103-2029

OSHA (Occupational Safety and Health Administration)
Emergencies: (800) 321-6742
OSHA/Wilkes-Barre Area Office. (570) 826-6538
The Stegmaier Building Fax: (570) 821-4170
Suite 410
7 North Wilkes-Barre Boulevard
Wilkes-Barre, PA 18702-5241

PA OFFICE OF HOMELAND SECURITY. (717) 651-2715
1800 Elmerton Avenue
Harrisburg, PA 17110

FEMA (Federal Emergency Management Agency). (800) 621-3362
500 C Street S.W.
Washington, D.C. 20472

PEMA (PA Emergency Management Agency).(570) 820-4400
Luzerne County Fax: (570) 820-4456
200 North River Street
Wilkes-Barre, PA 18711

PA Department Of Health - Luzerne County.(570) 826-2071
665 Carey Avenue Fax: (570) 820-4947
Wilkes-Barre, PA 18702

PA Department of Health.(877) 724-3258
Health and Welfare Building. Emergency (717) 737-5349
7th and Forster Streets
Harrisburg, PA 17120

Poison Control Center. (800) 521-6110
500 University Drive
Hershey PA 17033

Center of Disease Control. (800) 311-3435
1600 Clifton Rd Public Inquiries: (404) 639-3534
Atlanta, GA 30333

Department of Transportation - PennDOT Central Office
Note: For Winter Interstate Road Conditions.(888) 783-6783
This number is only operational from November 1st to April 30th.
Keystone Building
400 North Street
Harrisburg, PA 17120

Emergency Response and Fire Prevention Plan

Internal and External Key Contacts

Plant Leadership Team/Crisis Management Team
Table 8.1

<u>Name</u>	<u>Support Area</u>	<u>Role</u>	<u>Telephone</u>	<u>Cell Phone</u>
Terry Hartlage	Plant Manager	Incident Commander (IC), including plant operations of a serious nature, media and corporate contact	(570) 788-3118	(570) 436-4389
Christopher Sweeney	Engineering/Facilities/MRO/IT/Electrical/PLC/Projects	Alternate Incident Commander (IC), provide technical services within facility, environmental resource, etc.	(570) 868-6030	(570) 956-1406
James Babula	Operations Manager	Plant Operations at Operations Level	(570) 450-5058	(570) 578- 9394
Cory Hunsinger	Human Resources	Provides employee information as needed to IC, monitors weather conditions, employee relations, etc.	(570) 788-3489	(570) 579-7714 or (570) 578-4461
Janine Surmick	Safety, Health, Environmental and Quality (SHEQ)	Product Quality/Safety	(570) 455-0964	(570) 956-0460
Lawrence Shipton	Materials/Receiving/ Customer Services	Customer Services, Materials and Scheduling Activities	(570) 474-5481	(570) 216-0618
Frank Babula	Financial	Provides financial impacts	(570) 474-5789	(570) 704-6786
Mark Howard	TPM	Assist as needed, continuous improvement	N/A	(215) 520-1105

Emergency Response and Fire Prevention Plan

Safety, Health, and Environmental Resources

Table 8.2

<u>Name</u>	<u>Support Area</u>	<u>Role</u>	<u>Telephone</u>	<u>Cell Phone</u>
Fred Gestl	Safety, Health, Environmental and Quality (SHEQ)	SHE Manager	N/A	(570) 436-7108
Tony Swetz	Facilities/ Environmental	Environmental Coordinator	(570) 454-6043	(570) 956-0144
Chris Sweeney	Facilities/ Environmental	Technical Services Manager	(570) 868-6030	(570) 956-1406
Peter Crayton	Safety, Health, Environmental and Quality (SHEQ)	Director of SHEQ	(480)754-3440	(480) 812-5834

Medical First Responders

Table 8.3

Emergency Telephone Numbers			
Emergency Response Alarm in the plant: 333#			
Police, Fire, Ambulance: 911			
Lehigh Valley Health Network – Hazleton Campus Emergency Room: 570-501-4000			
Health & Wellness Center Occupational Health Clinic: 570-501-6800			
SHE Manager: Fred Gestl (570) 436-7108			
Poison Control Center: 1-800-521-6110			
3rd Shift	1st Shift		2nd Shift
Mario Alviar	Jude Allen	Eric Krapf	Jennifer Hendricks
Marlin Boehmer	Mike Ansbach	Michele Luminella	Bill Kaufman
Mike Coletta	Rich Bodwalk	Tom Mott	Robin Sontag
Doug Demshock	Glenn Davis	Chris Sweeney	Mark Williams
Doris Honse	Craig Derr	Tony Swetz	
Kevin Hunlock	Dan Dule		
Morgan Wenner			
Tom Wenner			
			Revision Status 4

Emergency Response and Fire Prevention Plan

**Emergency Contact Information
Table 8.4**

<u>Primary Contact:</u>	<u>Radio Stations</u>	<u>Television Stations</u>	<u>PennDOT Roadway Conditions</u>
Henkel West Hazleton Plant (570) 455-9980 Ext. 135	WKRZ 98.5 FM WGGY 101.3 FM WILK 1300 AM	SPPTV Local Channel 13	Hotline - (888) 783-6783 Website - 511PA.com
Call to listen to a recorded informational message. DO NOT leave a message when you call.	Listen to any of these three radio stations for informational messages.	Look for Listing, Service Electric Cable in the Hazleton Area Only.	Call to check on interstate road conditions for major highways. (Routes 80 and 81) *During Winter Season Only

Emergency Response, PPE, and Safety Equipment

**Emergency Response and PPE Equipment
Table 9.1**

<u>PPE, Emergency Response and Safety Equipment</u>	<u>Location</u>	<u>Inspection Frequency</u>
Eyewash Stations and Showers	Entire Facility	Weekly by Departments
First Aid Kits	Entire Facility	Monthly, SHE Manager
Automatic External Defibrillators (AED)	5 Units throughout the facility	Monthly, Security
Trauma Kits	1st Floor – in Processing Locker	Quarterly, by EMTs
Oxygen Tanks	1st Floor – in Processing Locker	Quarterly, by EMTs
Emergency Spill Kit(s), Equipment and Tools for Caustic, Acids, etc.	1st Floor Processing	Monthly - Environmental Coordinator
Air Quality Monitor(s), both portable and in-place	Processing	Annually, by Processing Technicians

Emergency Response and Fire Prevention Plan

**Fire Emergency Response Equipment
Table 9.2**

<u>Fire Emergency Response and Safety Equipment</u>	<u>Location</u>	<u>Inspection Frequency</u>
Fire Alarm/Pull Stations	At all exit doors	No inspection required
Overhead Sprinkler System(s)/PIV Valves	Entire Facility	Monthly PIV Valves by Facilities; Annually entire system by 3rd Party
Fire Extinguishers	Entire Facility, poles marked RED	Monthly by Security; Annual Test by 3rd Party
Fire Extinguishers (small)	Forklifts	Daily by Respective Technicians via Pre-Start Up Inspection
Listing of Emergency Response Team	Entire Facility	Annually (or when updated), by Team Leaders
Two-Way Radios	First Aid Room	Monthly, SHE Manager

**Utilities, Locations of Shut-down, Inspections
Table 9.3**

<u>Structural/Facility Equipment</u>	<u>Location</u>	<u>Inspection Frequency</u>
All operational equipment shall be shut down by the operator(s)	Entire Facility	Conducted routinely, by each Department
Thermal Electrical Panels (PPL: 1-800-342-5775)	Entire Facility	Annually, by Engineering
Main Water Shut-off/Filters and Pressure (ER Contact – Hazleton City Authority: 570-454-2401)	Laundry Care Processing and Label Room located on production floor in the south west corner	Daily, by Engineering
Natural Gas (ER Contact - UGI: 1-800-609-4844)	Outside (main employee entrance)	Monthly, by Facilities
Ventilation Systems/HVAC	Within the facility	Annually, by outside resource
Emergency Generator	Outside (main employee entrance)	Bi-Annually, by outside resource
Low Voltage Main Electrical Breaker	Electrical Room (located in the main employee entrance)	Annually, by Engineering
Compressed Air	Outside (the Pit area)	Daily check, by Facilities; Annually, by outside resource
Boilers	1 st Floor (Adjacent to Customer Services Shop)	Daily check, by Facilities; Annually, by outside resource
Exhaust Hood(s)	2 nd Floor (QA Lab)	Quarterly by QA and Annually, by outside resource

Emergency Response and Fire Prevention Plan

Hazards and Personal Protection

On-Site Fire Hazards
Table 10.1

<u>Fire Hazard</u>	<u>Storage/Handling</u>	<u>Ignition Sources</u>	<u>Fire Protection Systems</u>
Isopropyl Alcohol 70% Grade (Flashpoint > 64° F) and 99% Grade (Flashpoint > 53° F)	Metal drums/glass bottles. Stored in flammable cabinet(s)/transported by forklift or by hand in secondary containers.	Electric heaters, static electricity, spark producing equipment, open flames and sparks.	No smoking; no welding without a permit; stored in flammable cabinets; container(s) grounded with grounding strap.
Methanol (Flashpoint 52° F)	Glass bottles. Stored in flammable cabinet(s) /transported by hand	Electric heaters, static electricity, spark producing equipment, open flames and sparks.	No smoking; no welding without a permit; stored in flammable cabinets
Ethanol (Flashpoint 58° F)	Glass bottles. Stored in flammable cabinet(s) /transported by hand	Electric heaters, static electricity, spark producing equipment, open flames and sparks.	No smoking; no welding without a permit; stored in flammable cabinets
Rewoquat (a.k.a. Esterquat) (Flashpoint > 55° F)	Above-ground tanks in contained tank farm	Electric heaters, static electricity, spark producing equipment, open flames and sparks.	No smoking; no welding without a permit; only authorized personnel permitted to perform work on system(s); pre-work risk assessment and documentation required; any changes, other than change in kind, requires review through Management of Change (MOC) prior to the work performed.
Perfume(s) (Flashpoint > 154° F)	Metal totes with vent caps/transported by forklift, hose transfer/SOPs used	Electric heaters, static electricity, spark producing equipment, open flames and sparks.	No smoking; no welding without a permit; stored in a fire proof room with fire safety doors

Emergency Response and Fire Prevention Plan

Hazardous Chemical List

Table 10.2

Below is a list of the hazardous materials at the site. This table also contains the hazard rating, common/chemical name, reportable quantity, level of PPE required, UN#, CAS#, where the chemical is used/stored (see below) and the type of storage container.

Area 1: Main Floor (QA Lab and/or Fragrance Storage and Dispensing)

Area 2: LC Processing Area

Area 3: BC Processing Area

Area 4: Outside Tank Farm (s)

Area 5: Boiler Room

H= Health

F= Flammability

R=Reactivity

Health	Flammability	Reactivity	Common Name	Chemical Name	Reportable Quantity	UN #	CAS #	Usage/Storage Location	Storage Container Type
1	3	0	Acetone	Dimethyleketone; 2-propanone	5,000 lbs.	1090	67-64-1	Area 1, QA Lab	Bottle
2	3	2	Acetonitrile	Cyanomethane; Ethyl Nitrile	5,000 lbs.	1648	75-05-8	Area 1, QA Lab	Bottle
3	1	0	Adogen 66	Quaternary fatty amine ethoxylate	N/A	3082	68071-95-4	Area 4, Tank 4	Tank
3	1	0	Benzethonium Chloride (BZC)	Benzethonium Chloride	N/A	2923	121-54-0	Area 3, B Processing Warehouse	Drums
3	0	2	Caustic Soda Liquid	Sodium Hydroxide Solution	1,000 lbs.	1824	1310-73-2	Area 3	Tank
3	0	1	Chloroform	Chloroform	10 lbs.	1888	67-66-3	Area 1, QA Lab	Bottle

Emergency Response and Fire Prevention Plan

Health	Flammability	Reactivity	Common Name	Chemical Name	Reportable Quantity	UN #	CAS #	Usage/Storage Location	Storage Container Type
3	3	0	Esterquat	Rewoquat WE 18E US	N/A	1993	Mixture	Area 4	Tank
0	3	0	Reagent Alcohol	Ethyl Alcohol, Denatured, 95%	5,000 lbs.	1170	Mixture	Area 1, QA Lab	Bottle
1	3	0	Isopropyl Alcohol 70%	Isopropyl Alcohol 70%	N/A	1219	67-63-0	Area 1, Liquid Dial Pkg. Area/ Area 3 B Processing	Drum
1	3	0	Isopropyl Alcohol 99%	Isopropyl Alcohol 99%	N/A	1219	67-63-0	Area 1 QA Lab	Bottle
1	3	0	Methanol	Methanol	5,000 lbs.	1230	67-56-1	Area 1 QA Lab	Bottle
3	0	0	Neolone M-10	None	N/A	3265	2682-20-4	Area 2, UE Proc	Tote
1	2	0	Perfume	None	N/A	1266	Trade Secret	Area 1, Perfume Storage and UW Dispensing / Area 3 UK	Totes and Drums
3	1	0	Sulfonic Acid, 96%	Sulfonic Acid, 96%	1,000 lbs.	2584	50854-94-9	Area 3	Tank

Emergency Response and Fire Prevention Plan

Health	Flammability	Reactivity	Common Name	Chemical Name	Reportable Quantity	UN #	CAS #	Usage/Storage Location	Storage Container Type
3	0	2	Sulfuric Acid 100%	Sulfuric Acid 100%	1,000 lbs.	1830	7664-93-9	Area 2	Drums and Forklift Batteries
3	0	0	Tetra Sodium EDTA	Sodium Tetraphenylborate	N/A	3267	Mixture	Area 2, L Proc; Area 3 B Processing	Tote
3	2	0	Tri-Act 2814	None	500 lbs.	2734	Mixture	Area 5	Drum
3	1	0	Nalco 750	None	500 lbs.	N/A	Mixture	Area 5	Drum
3	2	0	Tri-Act 1830	None	92,700 lbs.	2734	Mixture	Area 5	Drum
3	0	1	Nalco 2584	None	3,000 lbs.	1719	Mixture	Area 5	Drum
3	0	1	Nalco 8735	None	3,000 lbs.	1719	Mixture	Area 5	Drum
3	0	0	Nalco 4207 Multifunction Boiler Treatment	None	500 lbs.	3266	7757-83-7	Area 5	Drum

Emergency Response and Fire Prevention Plan

Levels of Personal Protection
Table 10.3

Table 10.3 lists levels of protection that must be used when responding to an emergency or chemical release. This facility is equipped to handle Level D emergencies.

A	B	C	D
Highest level of skin, eye, and respiratory protection	Highest level of respiratory with a lesser skin protection	Used when all requirements are met for APRs, including identification and measurement of air contaminants and the ability of the respirator to remove them. Contaminants, splashes, or direct contact will not adversely affect or be absorbed through any exposed skin.	The atmosphere is free of all known hazards and the daily tasks pose no splash, immersion, or potential inhalation hazards.
<ul style="list-style-type: none"> - SCBA or supplied-air respirator with escape pack - Fully encapsulated suit and undergarment - Chemical resistant inner gloves and outer gloves (some may be built in) - Steel toe/shank work boots - Chemical resistant over boots, if needed (may be built in) - Hard hat worn under the suit 	<ul style="list-style-type: none"> -SCBA or supplied-air respirator with escape pack - Chemical resistant suit with hood or one/two piece chemical splash suits and undergarments - Chemical resistant outer and inner gloves - Chemical resistant boot with a steel toe/shank with a chemical resistant outer boot - Hard hat worn under the hood 	<ul style="list-style-type: none"> - Full face or half-mask Air Purifying Respirator - Chemical resistant suit with hood or one/two piece chemical splash suits and undergarments - Chemical resistant inner and outer gloves - Chemical resistant outer boot with a steel toe/shank and chemical resistant outer boot - Optional: hard hat under hood, face shield, goggles, safety glasses 	<ul style="list-style-type: none"> -Work uniform or coveralls - Gloves: leather or cloth or chemical resistant - Chemical resistant steel toe/shank boots or shoes. - Optional: Chemical resistant suit, chemical resistant outer boot, hard hat, safety glasses, goggles, and face shield

The Dial Corporation West Hazleton Facility
Hazardous Waste Cabinet Daily Check

RES 5/17/16
Attachment H

Location

Production Floor

DATE:

2013

Time	Checked By	Cabinet Locked Upon Arrival?	Free Of Leaks/Spills?	Is Cabinet Accessible?	Notes:
2/1 8:45 AM PO		Y/N	Y/N	Y/N	New Battery
2/2 9:30 PM PO		Y/N	Y/N	Y/N	
2/3 N/A		Y/N	Y/N	Y/N	
2/4 10:00 PM PO		Y/N	Y/N	Y/N	
2/5 10:00 PM LW		Y/N	Y/N	Y/N	
2/6 9:00 PM PO		Y/N	Y/N	Y/N	
2/7 2:00 P GN		Y/N	Y/N	Y/N	
2/8 1:45 PM GN		Y/N	Y/N	Y/N	
2/9		Y/N	Y/N	Y/N	
2/10 2:15 PM GN		Y/N	Y/N	Y/N	
2/11 1:45 PM GN		Y/N	Y/N	Y/N	
2/12 9:30 PM PK		Y/N	Y/N	Y/N	
2/12 8:00 PM PM		Y/N	Y/N	Y/N	
2/14 7:00 PM PO		Y/N	Y/N	Y/N	
2/15 6:05 PM PK		Y/N	Y/N	Y/N	
2/16 1:00 PM GN		Y/N	Y/N	Y/N	
2/17		Y/N	Y/N	Y/N	
2/18 1:00 PM GN		Y/N	Y/N	Y/N	
2/19 1:30 PM GN		Y/N	Y/N	Y/N	
2/20 9:55 PM PM		Y/N	Y/N	Y/N	
2/21 1:30 PM GN		Y/N	Y/N	Y/N	
2/22 6:00 PM LW		Y/N	Y/N	Y/N	
2/23 9:00 PM PO		Y/N	Y/N	Y/N	
2/24 7:11 PM PM		Y/N	Y/N	Y/N	
2/25 9:30 PM LW		Y/N	Y/N	Y/N	
2/26 9:00 PM LW		Y/N	Y/N	Y/N	
2/27 9:00 PM PO		Y/N	Y/N	Y/N	
2/28 1:00 PM GN 9:30 PM LW		Y/N	Y/N	Y/N	
2/29		Y/N	Y/N	Y/N	

The Dial Corporation West Hazleton Facility
Hazardous Waste Cabinet Daily Check

Production Floor

Location

Notes:

Time	Checked By	Cabinet Locked	Free Of	Is Cabinet	Notes:
Upon Arrival?	Leak/Spills?	Accessible?			
3/1 9:30 PM B	Y	Y	Y	Y	
3/2 10:00 PM B	Y	Y	Y	Y	
3/3	Y	Y	Y	Y	
3/4	Y	Y	Y	Y	
3/5 5:45 AM SS	Y	Y	Y	Y	
3/6 7:30 PM G	Y	Y	Y	Y	
3/7	Y	Y	Y	Y	
3/8 7:00 PM SS	Y	Y	Y	Y	
3/9	Y	Y	Y	Y	
3/10	Y	Y	Y	Y	
3/11 8:30 PM M	Y	Y	Y	Y	
3/12 9:00 PM B	Y	Y	Y	Y	
3/13	Y	Y	Y	Y	
3/14 2:00 AM SS	Y	Y	Y	Y	
3/15 2:30 PM B	Y	Y	Y	Y	
3/16 10:00 PM B	Y	Y	Y	Y	
3/17	Y	Y	Y	Y	
3/18 10:00 PM B	Y	Y	Y	Y	
3/19 1:00 PM G	Y	Y	Y	Y	
3/20 7:00 PM M	Y	Y	Y	Y	
3/21 9:00 PM B	Y	Y	Y	Y	
3/22 9:30 PM M	Y	Y	Y	Y	
3/23 11:00 PM G	Y	Y	Y	Y	
3/24	Y	Y	Y	Y	
3/25 2:00 PM G	Y	Y	Y	Y	
3/26	Y	Y	Y	Y	
3/27 12:20 AM M	Y	Y	Y	Y	
3/28 7:30 PM B	Y	Y	Y	Y	
3/29	Y	Y	Y	Y	
3/30	Y	Y	Y	Y	
3/31	Y	Y	Y	Y	

Drum on left is full

DATE:

2013

2013

The Dial Corporation West Hazleton Facility	Hazardous Waste Cabinet Daily Check
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Time	Checked By	Upon Arrival?	Cabinet Locked	Free Of	Is Cabinet Accessable?
4/1	10:00 PM	Y	Y	Y	Y
4/2	9:00 PM	Y	Y	Y	Y
4/3	7:15 PM	Y	Y	Y	Y
4/4		Y	Y	Y	Y
4/5	1:30 PM - 9:30 PM	Y	Y	Y	Y
4/6	2:00 PM	Y	Y	Y	Y
4/7		Y	Y	Y	Y
4/8	6:00 AM	Y	Y	Y	Y
4/9	7:30 PM	Y	Y	Y	Y
4/10	2:00 PM	Y	Y	Y	Y
4/11	3:00 PM	Y	Y	Y	Y
4/12	3:00 PM	Y	Y	Y	Y
4/13	8:00 PM	Y	Y	Y	Y
4/14	11A	Y	Y	Y	Y
4/15	8:30 PM	Y	Y	Y	Y
4/16	8:00 PM	Y	Y	Y	Y
4/17	9:00 PM	Y	Y	Y	Y
4/18	2:00 PM	Y	Y	Y	Y
4/19	8:00 PM	Y	Y	Y	Y
4/20	9:30 PM	Y	Y	Y	Y
4/21		Y	Y	Y	Y
4/22	8:00 PM	Y	Y	Y	Y
4/23	7:30 PM	Y	Y	Y	Y
4/24	9:00 PM	Y	Y	Y	Y
4/25	8:57 PM	Y	Y	Y	Y
4/26	2:00 PM	Y	Y	Y	Y
4/27	10:00 PM - 6:30 PM	Y	Y	Y	Y
4/28		Y	Y	Y	Y
4/29	10:00 PM	Y	Y	Y	Y

Production Floor

Notes:

Drums on Right! 5 full
Drums Roll Forward into Ballies

○ ۱۳۷۱ - ۱۳۷۲ در باره

0a
EJ

THE DIAL CORPORATION
125 JAYCEE DRIVE
WEST HAZLETON, PA 18202



CERTIFICATE OF ACCEPTANCE FOR RECYCLING AND/OR DISPOSAL

ISSUED TO:

RECYCLEPAK PROGRAM RECEIVING
W6490B SPECIALTY DR. GREENVILLE, WI 54942

By accepting the waste products described by the document number below on this certificate, Veolia ES Technical Solutions L.L.C. (Veolia ES) certifies to the generator that the transportation, storage or processing methods employed are in accordance with Veolia ES permit parameters and all applicable federal, state and local laws.

K7049777
DOCUMENT#:

02/12/2016

RECEIVED DATE:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
90 PLEASANT STREET PO BOX 10
WEST BRIDGEWATER, MA 02379
PROCESSING FACILITY:

MAC300017498

PROCESSING FACILITY EPA ID#:

4K50671L-2M55656N

UNIQUE CONTAINER#:

691191789089655

RETURN TRACKING#:

SUPPLY-040

RECYCLEPAK PRODUCT CODE#:

Product Code	Description	QTY	UOM
BL-NPCB-RE	Recycle - Non-PCB Lamp Ballasts	46.0000	P

KEY: P=POUNDS, LFT = LINEAR FEET, LMP = LAMP, EA = EACH. Questions regarding this certificate should be directed to customer service, toll-free at 1-888-669-9725.



VEOLIA

ENVIRONMENTAL SERVICES

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
1275 MINERAL SPRINGS DRIVE
PORT WASHINGTON, WI 53074

John P. McShane

John P. McShane, Branch Manager

PLS 5/17/16
Attachment I.

THE DIAL CORPORATION
125 JAYCEE DRIVE
WEST HAZLETON, PA 18202



CERTIFICATE OF ACCEPTANCE

FOR RECYCLING AND/OR DISPOSAL

ISSUED TO:

RECYCLEPAK PROGRAM RECEIVING
W6490B SPECIALTY DR. GREENVILLE, WI 54942

By accepting the waste products described by the document number below on this certificate, Veolia ES Technical Solutions L.L.C. (Veolia ES) certifies to the generator that the transportation, storage or processing methods employed are in accordance with Veolia ES permit parameters and all applicable federal, state and local laws.

K7049778
DOCUMENT#:

02/12/2016

RECEIVED DATE:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
90 PLEASANT STREET PO BOX 10
WEST BRIDGEWATER, MA 02379
PROCESSING FACILITY:

MAC300017498

PROCESSING FACILITY EPA ID#:

9050673P-7Q55664R

UNIQUE CONTAINER#:

691191789089662

RETURN TRACKING#:

SUPPLY-040

RECYCLEPAK PRODUCT CODE#:

Product Code	Description	QTY	UOM
BL-NPCB-RE	Recycle - Non-PCB Lamp Ballasts	32.0000	P

KEY: P=POUNDS, LFT = LINEAR FEET, LMP = LAMP, EA = EACH. Questions regarding this certificate should be directed to customer service, toll-free at 1-888-669-9725.



VEOLIA

ENVIRONMENTAL SERVICES

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
1275 MINERAL SPRINGS DRIVE
PORT WASHINGTON, WI 53074

John P. McShane

John P. McShane, Branch Manager

THE DIAL CORPORATION
125 JAYCEE DRIVE
WEST HAZLETON, PA 18202



CERTIFICATE OF ACCEPTANCE FOR RECYCLING AND/OR DISPOSAL

ISSUED TO:

THE DIAL CORPORATION
125 JAYCER DR WEST HAZELTON, PA 18202

By accepting the waste products described by the document number below on this certificate, Veolia ES Technical Solutions L.L.C. (Veolia ES) certifies to the generator that the transportation, storage or processing methods employed are in accordance with Veolia ES permit parameters and all applicable federal, state and local laws.

K7037560
DOCUMENT#:

02/11/2016

RECEIVED DATE:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
90 PLEASANT STREET PO BOX 10
WEST BRIDGEWATER, MA 02379
PROCESSING FACILITY:

MAC300017498
PROCESSING FACILITY EPA ID#:

8E50915F-3G67964H
UNIQUE CONTAINER#:

691191791038764
RETURN TRACKING#:

SUPPLY-043
RECYCLEPAK PRODUCT CODE#:

Product Code	Description	QTY	UOM
LP-F04	Recycle - Four Foot Fluorescent Lamps	29.0000	LMP

KEY: P=POUNDS, LFT = LINEAR FEET, LMP = LAMP, EA = EACH. Questions regarding this certificate should be directed to customer service, toll-free at 1-888-669-9725.



VEOLIA
ENVIRONMENTAL SERVICES

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
1275 MINERAL SPRINGS DRIVE
PORT WASHINGTON, WI 53074

John P. McShane

John P. McShane, Branch Manager

THE DIAL CORPORATION

**QUALITY CONTROL, CO-PACKER
SAMPLE, & MISC. PRODUCTS**

RLS 6/28/16
Attachment J

ORDER, Warehouse
Release and Shipper No.

076124

A (Henkel) Company

SHIP TO ICSI 1441 S. Bancombe Rd Greer, SC 29651	WAREHOUSE	THIS FORM CAN NOT BE USED TO AUTHORIZE SHIPMENT OF FINISHED GOODS IN FULL CASES
ACCOUNT NUMBER	SHIP TO ARRIVE	
CHARGE TO	CARRIER HSM Solutions	
	VEHICLE NO. #5250	
	SHIP DATE 2/3/2016	
	DATE WRITTEN/INITIALS 2/3/16 TS	

[illegible]

Signature

Date _____

Whse.
Release No.

DL-6573 (REV. 3/97)

WHITE - ORIGINAL PINK - DIAL CORP-ACCOUNTING CANARY - PLANT COPY BLUE - PACKING LIST-INCLUDE WITH SHIPMENT. GREEN - ORIGINATING FILE COPY

THE DIAL CORPORATION

**QUALITY CONTROL, CO-PACKER
SAMPLE, & MISC. PRODUCTS**

ORDER, Warehouse
Release and Shipper No.

080805

A (Henkel) Company

SHIP TO ICSI	WAREHOUSE	THIS FORM CAN NOT BE USED TO AUTHORIZE SHIPMENT OF FINISHED GOODS IN FULL CASES
1441 S. Buncombe Rd	SHIP TO ARRIVE	
Greer, SC 29651	CARRIER Dowell Express	
	VEHICLE NO. 210	
ACCOUNT NUMBER	SHIP DATE 5/19/16	
CHARGE TO	DATE WRITTEN/INITIALS 5/19/16 TS	

[illegible]

Signature

Date _____

Whse.
Release No.

DL-6573 (REV. 3/97)

WHITE - ORIGINAL PINK - DIAL CORP ACCOUNTING CANARY - PLANT COPY BLUE - PACKING LIST-INCLUDE WITH SHIPMENT GREEN - ORIGINATING FILE COPY

RLS 5/17/16
Attachment K

GREATER HAZLETON JOINT SEWER AUTHORITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER 06

The below-named Industrial User, hereinafter referred to as Permittee, is issued this Permit by the Greater Hazleton Joint Sewer Authority ("Authority"), under authority vested by the *Borough of West Hazleton* in its Pretreatment Ordinance ("Ordinance").

Permittee: **Henkel Consumer Goods, Inc.**

Physical Address: **125 Jaycee Drive
West Hazleton, PA 18202**

Mailing Address: **125 Jaycee Drive
West Hazleton, PA 18202**

NOTICE TO PERMITTEE

The Permittee is hereby authorized to Discharge Industrial Wastes from the facility identified above, through the Discharge points identified herein, into the Sewer System. Such Discharge is subject to the conditions contained in this Permit and the rules, regulations, and ordinances of the *Borough of West Hazleton*, as well as the rules and regulations of the Greater Hazleton Joint Sewer Authority.

This Permit shall become effective on: December 1, 2015
and shall expire on: December 31, 2018
except as otherwise provided.

No Discharge of Industrial Waste may occur after December 31, 2018 unless the Permittee has properly applied for renewal of the Permit at least 180 days prior to the expiration date. The date on which the application for renewal is due is July 3, 2018. A form, to be used to apply for renewal of this permit, is attached hereto.

The above-named Permittee may petition to appeal the terms or conditions of this Permit by notifying the Authority in writing within thirty (30) days of receipt. Failure to submit a petition for appeal within the specified time shall constitute a waiver of the right of appeal. Specific requirements for appeals are found in the Ordinance.

Issued By:


Pretreatment Coordinator

Date:

November 30, 2015

For information, contact:

Pretreatment Coordinator
Greater Hazleton Joint Sewer Authority
P.O. Box 651
Hazleton, PA 18201-0651

Henkel Consumer GoodsPermit Number 06

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Henkel Consumer GoodsPermit Number 06

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<u>Title</u>	<u>Attachment</u>
Sampling Results Report	1
Routine Compliance Report	2
Application for Permit Renewal	3

Henkel Consumer GoodsPermit Number 06**PART 1 - DISCHARGE LIMITATIONS****A. Unauthorized Discharges**

The Pretreatment Ordinance establishes prohibitions on Discharges; such prohibitions are listed in Part 5, Section I of this Permit. Any Prohibited Discharge or other Unauthorized Discharge, whether accidental or deliberate, requires that a report be filed with the Authority (See PART 3, paragraph D of this Permit).

B. Limitations on Specific Pollutants

The following limitations apply to all Industrial Waste Discharges. **Note:** Dilution of a Discharge with potable or clean process water in order to attain the required concentrations is specifically prohibited.

LIMITS TABLE

Pollutant	Maximum Daily Loading (lbs/day)	Maximum Daily Concentration (mg/L)
5 Day Biochemical Oxygen Demand	3,670	---
7 Day Biochemical Oxygen Demand *	---	Monitor Only
Chemical Oxygen Demand *	---	Monitor Only
Total Suspended Solids (TSS)	---	1,650
Fats, Oil, & Grease (Animal/Vegetable)	---	Monitor Only
Total Petroleum Hydrocarbon (TPH)	---	Monitor Only
Arsenic	---	1.70
Cadmium	---	4.71
Chromium (Total)	---	5.30
Copper	---	1.80
Lead	---	3.60
Mercury	---	0.19
Nickel	---	4.10
Silver	---	1.70
Zinc	---	2.50
Total Cyanide	---	2.10
Benzene	---	0.01
Chlorobenzene	---	2.29
Chloroform	---	0.06
Ethyl Benzene	---	1.66
Methylene Chloride	---	1.00
Toluene	---	2.07
1,1,1-Trichloroethane	---	1.50
MBAS, Surfactants	---	Monitor Only
pH	---	6.0 s.u. to 10.0 s.u.

* Categorical Pretreatment Standards, 40 CFR Part 417 Soap and Detergent Mfg., Subpart P, Liquid Detergents, Section 417.166.

Henkel Consumer GoodsPermit Number 06**PART 1 - DISCHARGE LIMITATIONS (Continued)**C. Flow Restrictions

The rate of Discharge is limited as follows:

<u>Point of Discharge</u>	<u>Average Daily Flow</u>	<u>Maximum Daily Flow</u>
01:	<u>40,000 gpd</u>	<u>60,000 gpd</u>

D. Discharge Point

Industrial Waste may only be discharged at the following points:

Point 01: The 6-inch PVC process wastewater sewer lateral exiting the facility at the northwest side outside the facility, as shown in Figure 1.

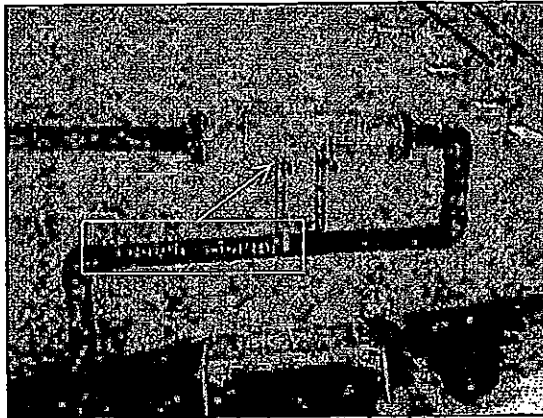


Figure 1. Discharge Point 01

Henkel Consumer GoodsPermit Number 06**PART 2 - MONITORING REQUIREMENTS****A. Sampling Points**

All sampling shall take place at *sampling station along the 6-inch PVC process wastewater sewer lateral exiting the facility at the northwest side outside the facility, as shown in Figure 1.*

B. Sampling Frequency and Type

The following table presents the minimum requirements for monitoring the Discharge.

MONITORING REQUIREMENTS TABLE

Parameter	Minimum Sampling Frequency	Sample Type*
5 Day Biochemical Oxygen Demand	1 every 6 months	24 Hour Composite
7 Day Biochemical Oxygen Demand**	1 every 6 months	24 Hour Composite
Chemical Oxygen Demand**	1 every 6 months	24 Hour Composite
Total Suspended Solids (TSS)	1 every 6 months	24 Hour Composite
Fats, Oil, & Grease (Animal/Veg.)	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Total Petroleum Hydrocarbon (TPH)	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Arsenic	1 every 6 months	24 Hour Composite
Cadmium	1 every 6 months	24 Hour Composite
Chromium (Total)	1 every 6 months	24 Hour Composite
Copper	1 every 6 months	24 Hour Composite
Lead	1 every 6 months	24 Hour Composite
Mercury	1 every 6 months	24 Hour Composite
Nickel	1 every 6 months	24 Hour Composite
Silver	1 every 6 months	24 Hour Composite
Zinc	1 every 6 months	24 Hour Composite
Total Cyanide	1 every 6 months	Minimum 4 Equal Composite Grabs over 24 hrs.
Benzene	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Chlorobenzene	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Chloroform	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Ethyl Benzene	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Methylene Chloride	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
Toluene	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
1,1,1-Trichloroethane	1 every 6 months	Minimum 4 Equal Grabs over 24 hrs.
MBAS, Surfactants	1 every 6 months	24 Hour Composite
Flow	Daily	Metered

* ALL GRAB SAMPLES MUST BE COLLECTED DURING THE DISCHARGE PERIOD
FOR DEFINITIONS OF SAMPLE TYPES, SEE THE DEFINITIONS IN PART 5 OF THIS
PERMIT.

** CATEGORICAL PARAMETERS. SEE PART 4.B. OF THIS PERMIT.

Henkel Consumer GoodsPermit Number 06**PART 2 - MONITORING REQUIREMENTS (Continued)****C. Sampling and Analysis Requirements**

1. All samples taken for purposes of demonstrating compliance with this Permit must be representative of normal facility operations. Samples must be composited over the period during which all normal activities resulting in an industrial waste discharge occur. This may include production, clean-up, and equipment preparation activity. Sampling should not occur during periods when industrial waste is not normally discharged, or in such a manner as to cause dilution of the discharge with uncharacteristic volumes of Sanitary Sewage or Non-Contact Cooling Water. This requirement does not apply when sampling of Spills or Slug Loads is necessary.
2. All sampling and analysis shall be conducted using United States Environmental Protection Agency (EPA) approved procedures, published in 40 CFR Part 136. In the absence of such an approved procedure, procedures in "Standard Methods for the Examination of Water and Wastewater," published by the Water Environment Federation and the American Public Health Association, or other methods, may be used upon approval by the Authority's Pretreatment Coordinator.
3. The laboratory analysis reports shall indicate:
 - The results of analysis,
 - The methods used,
 - Detection limits (for those substances not detected -ND),
 - The date of analysis, and
 - The analyst(s) who performed the tests.Permittees that use the services of Contract laboratories are responsible for ensuring that the laboratory provides all of the required information.
4. All samples shall be accompanied by Chain of Custody forms, allowing the sample to be identified as to date, time and place of sampling, type of sample, method of sample preservation, and showing the identity of all individuals who obtained, transported and stored the sample. Copies of Chain of Custody forms shall be submitted with the laboratory analysis reports accompanying the Sampling Results Reports or the Routine Compliance Reports required by PART 3, of this Permit.
5. More frequent sampling than the minimum required above is allowable and is encouraged. However, the results of ALL tests performed on Discharged Wastewater obtained at the specified sampling point and using approved methods shall be submitted to the Pretreatment Coordinator.

Henkel Consumer GoodsPermit Number 06**PART 3 - REPORTING REQUIREMENTS****A. Sampling Reports**

1. The Permittee shall instruct the laboratory to send copies of its analysis reports (via fax or email) directly to the Pretreatment Coordinator at the same time as the reports are provided to the Permittee. This does not substitute for the Permittee's duty to report sample results as described below.
2. Within ten (10) days of receipt of laboratory test results, the Permittee must complete a **Sampling Results Reporting Form** and forward it to the Pretreatment Coordinator. The Sampling Results Report may not be completed by the laboratory. Every time sampling results are received a Sampling Results Reporting Form must be completed and submitted along with the results. The Sampling Results Reporting Form attached to this Permit must be used. The Sampling Results Report must be accompanied by copies of the laboratory analysis report meeting the requirements of PART 2, paragraph C.3 of this permit, and the chain of custody form for the sample(s) analyzed, as required by PART 2, paragraph C.4.
3. When sample results are received at a time when a Routine Compliance Report is due (see section B below for requirements for Routine Compliance Reports), the results may be reported on the Routine Compliance Report along with the other information for the reporting period. In this case, the Sampling Results Report form is not required, but the laboratory report and chain of custody form must be included with the Routine Compliance Report. However, note the ten (10) day reporting requirement for sampling results (Paragraph A.2) and do not delay submission of sampling results in order to submit them with the Routine Compliance Report.

B. Routine Compliance Reports

1. **Routine Compliance Reports** are required to be forwarded to the Pretreatment Coordinator a minimum of twice a year. The reports are due on or before **January 31** and **July 31** of each year. Each report shall provide information on the preceding six-month period ending **December 31** or **June 30**, as appropriate. A Routine Compliance Report form is attached to this Permit. This reporting form must be used.

Henkel Consumer Goods

Permit Number 06

PART 3 - REPORTING REQUIREMENTS (Continued)

C. Completeness of Reports

The Routine Compliance Report Form and the Sampling Results Reporting Form must be filled out completely, signed by the Authorized Representative (see Definitions), and attested. Incomplete or unsigned forms or those submitted after the date due, constitute a Permit violation and may result in enforcement actions being taken.

D. Violation and Resampling Reports

1. Upon discovery of a violation of the Discharge limits imposed under PART 1 (or PART 4) of this Permit, whether by means of a laboratory analysis report or by other means, the Permittee shall, **within 24 hours of discovery, report the violation, either orally or in writing, to the Pretreatment Coordinator.** (Note the duty of the Permittee to examine the results of all laboratory reports received as soon as practicable upon their receipt. See Part 5, paragraph.D.4 of this Permit.)
2. Whenever a violation of discharge limits is discovered, the Permittee shall arrange for another sample to be obtained and analyzed for the substances found to be in violation. The results of this analysis must be reported to the Pretreatment Coordinator within thirty (30) days of the original discovery. Re-samples shall meet all of the sampling, preservation, analytical and reporting requirements specified in this Permit.
3. A summary of the actions taken within the reporting period with regard to the violation must also appear in the next Routine Compliance Report. Space is provided on the form to include this information.

E. Unauthorized Discharge, Spill or Slug Load Report

1. The Permittee shall notify, by telephone, the Pretreatment Coordinator or the Director of Operations of the Sewage Treatment Plant immediately upon the commencement or occurrence of a **Spill, an accidental Discharge of prohibited substances, substances in unusually high concentration, a Slug Load, or of any other discharge which the permittee has reason to believe could cause problems at the POTW.** The notification shall include, at a minimum, the date, time, and place of the Discharge, the nature (substance(s), concentration and volume) of the Discharge, the duration or expected duration of the Discharge, and the corrective actions taken or planned. Notification of the Authority does not relieve the Permittee of other reporting requirements, including any Federal or State requirements and shall not be a defense against any enforcement actions that the Authority may take against the Permittee.

Henkel Consumer GoodsPermit Number 06**PART 3 - REPORTING REQUIREMENTS (Continued)****E. Unauthorized Discharge, Spill or Slug Load Report (Continued)**

2. The Permittee shall post in appropriate locations the notification procedures necessary to comply with this requirement and ensure that all responsible employees are aware of this requirement. At a minimum, the posting shall contain the following:

Notification of Accidental Discharge:
Telephone Greater Hazleton Wastewater Treatment Plant:
(570) 454-0851

3. Within five (5) days of a Spill, Slug Load, or similar occurrence, the Permittee shall submit a written report of the incident to the Authority. The report shall contain, at a minimum:
 - a. A description of the upset, Slug Load, Spill, or other discharge; the characteristics (volume, concentration and constituents) of the Discharge; the location and cause of the Discharge and any other pertinent information.
 - b. A description of the effect the Discharge had, or may have had, on the compliance status of the Permittee. Relate the nature of the discharge to the requirements in PART 1 of this Permit (and PART 4, if applicable).
 - c. The duration of the discharge, and, if it is continuing, the time when compliance is reasonably expected to occur.
 - d. A description of the steps taken to reduce the volume, toxicity, rate or other characteristics of the discharge so as to reduce its impact on the Sewage Collection System and Sewage Treatment Plant.
 - e. A description of all steps taken and all steps planned, to prevent re-occurrence of such a Spill or Slug Load event. This part shall normally consist of a Spill Prevention Control and Countermeasure Plan (SPCC Plan). An alternative plan, if appropriate, may be acceptable.

Henkel Consumer GoodsPermit Number 06**PART 3 - REPORTING REQUIREMENTS (Continued)****E. Accidental Discharge, Spill or Slug Load Report (Continued)**

- f. The report must be signed by the Authorized Representative as defined in PART 5, Paragraph J of this Permit, and contain the required certification of accuracy and completeness as contained in the Routine Compliance Report form attached to this Permit.

F. Hazardous Waste Discharge Report

1. All Industrial Users shall notify the Authority, the US EPA Regional Waste Management Division Director, and the Pennsylvania Department of Environmental Protection (DEP), Bureau of Waste Management, in writing, of any discharge into the sewer system of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification shall include the name of the hazardous waste, as set forth in 40 CFR Part 261, the US EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Industrial User Discharges more than one hundred (100) kilograms of such waste per calendar month, the notification shall also include the following information, to the extent that it is known and readily available to the Industrial User:
 - (a) An identification of the hazardous constituents contained in the waste;
 - (b) An estimation of the mass and concentration in the Wastewater of all such constituents discharged in the most recent month; and
 - (c) An estimate of the mass and concentration of such constituents expected to be discharged during the following twelve months.
2. Industrial Users that commence such a discharge after the issuance of this Permit shall submit the report within one hundred eighty (180) days of first Discharge of the hazardous waste, except as provided in part 4 of this paragraph.
3. The required report need be submitted only once for each hazardous waste discharged. Industrial Users regulated under Categorical Standards, which have already submitted such information in baseline monitoring reports or periodic compliance reports do not have to report this information again.

Henkel Consumer GoodsPermit Number 06**PART 3 - REPORTING REQUIREMENTS (Continued)****F. Hazardous Waste Discharge Report (Continued)**

4. Industrial Users that discharge less than fifteen (15) kilograms of hazardous wastes in a calendar month do not have to comply with these reporting requirements. This exemption does not apply to acute hazardous wastes as specified in 40 CFR §261.30(d) and 261.33(e).
5. An Industrial User shall notify the Authority within five (5) days of becoming aware of any discharges of reportable quantities of listed or unlisted Hazardous Substances, as defined at 40 CFR § 302.4 (CERCLA Hazardous Substances). This notification shall include the time of release; the name of the substance; the identifying CAS number, if known; and the approximate quantity discharged. If the discharge constitutes a Spill, change in wastewater constituents, or Slug Load, other reporting requirements described in this Permit also apply.
6. Each notification required by this section shall include a statement certifying that the Industrial User has a program in place to reduce the volume and/or toxicity of the discharged wastes to the extent that it is economically practical. This statement shall be signed by the Authorized Representative of the Industrial User. If no such program is in place, the notification shall so state and provide a reasonable schedule for adopting and implementing such a program.

G. Change in Discharge Conditions

1. Any change in the nature of the manufacturing process, clean-up procedures, raw materials, pretreatment processes or other changes which are reasonably expected to change the composition, character or rate of discharge of the Industrial Waste, shall be reported to the Pretreatment Coordinator at least thirty (30) days prior to making any such change, or promptly upon the decision to make the change if less than thirty (30) days will elapse between such a decision and the implementation of the change, or immediately upon the discovery that an unplanned change has already occurred.

Henkel Consumer GoodsPermit Number 06**PART 4 - SPECIAL CONDITIONS****A. Special Discharge Requirements**

As listed in 40 CFR, the Categorical Pretreatment Standards for the Soap and Detergent Manufacturing Point Source Category Part 417, Subpart P – Manufacture of Liquid Detergents Subcategory Section 417.166 for new sources apply, which are listed in the Limits Table in Part 1B.

B. Special Monitoring and Reporting Requirements

The Henkel Consumer Goods, Inc. facility is a federal categorical discharger in the Soap and Detergent Manufacturing Point Source Category. Categorical pretreatment standards, as listed in 40 CFR Part 417 Subpart P, for monitoring and reporting apply. Specifically, there is a requirement to certify that federal categorical standards have been met for the reporting period. A professional engineer must make this certification based upon review of lab analyses that:

- a) The COD/BOD₇ ratio does not exceed 10.0; and
- b) The COD does not exceed 1.10 kg/1,000 kg of anhydrous product.

The “Compliance with Categorical Pretreatment Standards” certification is included with the Permittee’s Routine Compliance Report (Attachment 2) and must be submitted twice a year as required in Part 3, Section B.

D. Compliance Schedule

There is no compliance schedule required for this Permittee.

E. Special Facility Operation/Management Requirements

The Permittee shall provide spill prevention, control, and /or management sufficient to prevent any spills of pollutants from entering the sanitary sewer system as required under EPA pretreatment regulations in the Code of Federal Regulations, Title 40 Part 403.8 and the Greater Hazleton Joint Sewer Authority Resolution Number 003 of 2015, Section 3.09. The Permittee shall develop and implement a Spill Prevention Control and Countermeasures (SPCC) Plan in conformance with the PA DEP’s “Guidelines for the Development and Implementation of Environmental Emergency Response Plans” (DEP Document 400-2200-001). The intent of the SPCC Plan is to prevent and control accidental discharges of pollutants to the sanitary sewer system.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 008925266 JJK
5. Generator's Name and Mailing Address Dial Corporation 125 Jaycee Drive West Hazleton, PA 18202 Generator's Phone: 570-455-9880			Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name Elk Transportation, Inc.			U.S. EPA ID Number PAD 987 271 020		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address Cycle Chem, Inc. 550 Industrial Drive Lewisberry, PA 17339 Facility's Phone: 717-938-4700			U.S. EPA ID Number PAD 067 098 822		

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. RQ Waste Corrosive Solid, Acidic, Inorganic, n.o.s., (Sulfuric Acid, Lead), 8, UN3260, PG II	XX2	DF	XXX50	P	D008		
X	2. Waste Corrosive Liquid, Acidic, Organic, n.o.s., (Methyl-4-isothiazol-3-One), 8, UN3265, PG II	XX1	DF	XXX10	P	D002		
X	3. RQ Waste Mercury, 8, UN2809, PG III	XX1	DF	XXX10	P	D009	U151	
X	4. Corrosive Solid, Acidic, Inorganic, n.o.s., (Sulfuric Acid), 8, UN3260, PG II	XX1	DF	XX400	P	NONE		

14. Special Handling Instructions and Additional Information

a) ERG# 154 (Battery Changing Floor Waste) Approval No.

b) ERG# 163 (Naclona M-10) Approval No.

c) ERG# 172 (Broken Thermometers) Approval No.

d) ERG# 154 (Non-RQRA Sulfuric Acid Debric) Approval No.

Bill to: Elk Environmental
DIO108A2

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name: **Tony Swob** Signature: **Tony Swob** Month: **01** Day: **09** Year: **12**

16. International Shipments	<input type="checkbox"/> Import to U.S.	<input type="checkbox"/> Export from U.S.	Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):			

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: **WAYNE C MOHR** Signature: **Wayne C Mohr** Month: **01** Day: **09** Year: **12**

Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. **H111** 2. **H111** 3. **H111** 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: **Mike Hike** Signature: **Mike Hike** Month: **1** Day: **13** Year: **12**

was 1/24/12



Cycle Chem, Inc.

Recycling Treatment & Disposal of Hazardous

Date: 02/24/2012

Mr. Robert Finkel
Department of Environmental Protection
Bureau of Solid Waste Management
13th Floor, MSSOB
400 Market Street
Harrisburg, PA 17101-2301

Re: Manifest correction

Dear Mr. Finkel

We have recently discovered the manifest corrections listed below and ask you to note the corrections described. I have sent a copy of this letter to all parties listed on this manifest. All other parties please file this letter with your manifest copy. If you have any questions, please call me at (717) 938-4700.

Manifest #: 008925266JJK

Shipment date: 01/13/12

Gencode: ELK265

EPA ID #: PAD987271012

Generator: Dial Corporation
125 Jaycee Drive
West Hazleton, PA 18202

Transporter(s): Elk Transportation, Inc.

Correction:

Page 1 Line 2 Should Read "Corrosive Solid, Acidic, Inorganic, nos (sulfuric acid)
8 UN3260 PG II
(no waste code)

Sincerely,

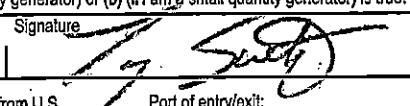
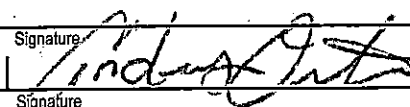
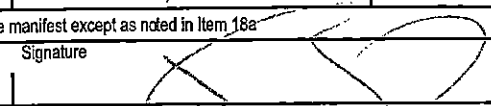
Edward A. Stehley
Cycle Chem, Inc.-representative
550 Industrial Drive
Lewisberry, PA 17339

CC:

Other state environmental agency
Named generator
Named transporter(s)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 008925265 JJK	
5. Generator's Name and Mailing Address Dal Corporation 125 Jaycee Drive West Hazleton, PA 18202 Generator's Phone: 570-455-9980			Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Elk Transportation, Inc.			U.S. EPA ID Number PAD 987 271 020			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Glenn Resource Recovery - Sumter, Inc. 755 Industrial Road Sumter, SC 29150 Facility's Phone: 803-773-1400			U.S. EPA ID Number SCD 036 275 626			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.
			No.	Type		
	1.	Non Hazardous Non Regulated Material, (AES Waste)	XX3	DM	XX105	G
	2.	Non Hazardous Non Regulated Material, (Calcium Chloride Pellets)	XX1	DF DM (ICM)	XX110	P
	3.	Non Hazardous Non Regulated Material, (Sunflower & Grapeseed Oil)	X10	DF DM (ICM)	XX50	G
4.	NON HAZARDOUS NON REGULATED MATERIAL (AES WASTE)	X14	DF	XX770	G	NREG
14. Special Handling Instructions and Additional Information a) (AES Waste) Approval No. 115863 b) (Calcium Chloride Pellets) Approval No. B123313 c) (Sunflower & Grapeseed Oil) Approval No. 123314 DOCAES WASTE APPROVAL NO 115863 Bill to: Elk Environmental DIO106A2						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Tony Swetz			Signature <i>Tony Swetz agent of Dal Corp</i>		Month Day Year 01/09/12	
TRANSPORTER INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
	17. Transporter Acknowledgment of Receipt of Materials					
TRANSPORTER	Transporter 1 Printed/Typed Name WAYNE C MOHR			Signature <i>Wayne C Mohr</i>		Month Day Year 01/09/12
	Transporter 2 Printed/Typed Name			Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity 1.839 # <input type="checkbox"/> Type 3.434 # <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 2.86 # 4.5002 # Manifest Reference Number:					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	Facility's Phone:					
	18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name Charly Harris			Signature <i>Charly Harris</i>		Month Day Year 1/12/12	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 009543557 JJK		
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DRIVE WEST HAZELTON, PA 18202		Generator's Site Address (if different than mailing address)					
Generator's Phone: 570-455-9980							
6. Transporter 1 Company Name ELK TRANSPORTATION, INC.				U.S. EPA ID Number PAD 987 271 020			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1023 FREDERICK STREET DETROIT, MI 48211				U.S. EPA ID Number MID 980 991 566			
Facility's Phone: 313-347-1300							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. UN1325, Waste Flammable Solids, Organic, n.o.s., (Isopropanol), 4.1, PG III	xx2	DF	xx120	P	D001	
X	2. UN3286, Waste Corrosive Liquid, Basic, Inorganic, n.o.s., (Potassium Hydroxide), 8, PG II	xx1	DF	xxx30	P	D002	
	3.						
	4.						
14. Special Handling Instructions and Additional Information a) ERG# 133 (ESTERQUAT) Approval # C116143DET b) ERG# 154 (ALKALINE LIQUID, DRIP PAN WASTE) Approval # E102045DET Billed to: Elk Environmental DI0309A2 / 120246							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Tony Swetz				Signature <i>Tony Swetz</i>		Month Day Year 3 14 12	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name DAVID J. INFANTE JR.				Signature <i>[Signature]</i>		Month Day Year 03 14 12	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: _____							
18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141		2. H111		3.		4.	
20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <i>[Signature]</i>				Signature <i>[Signature]</i>		Month Day Year 3 21 12	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 009543755 JJK			
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DRIVE WEST HAZELTON, PA 18202		Generator's Site Address (if different than mailing address)						
Generator's Phone: 570-456-9880								
6. Transporter 1 Company Name ELK TRANSPORTATION, INC.				U.S. EPA ID Number PAD 987 271 020				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK STREET DETROIT, MI 48211				U.S. EPA ID Number MI0 980 991 566				
Facility's Phone: 313-347-1300								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. RQ, UN2925, Waste Flammable Solids, Corrosive, Organic, n.o.s., (contains formaldehyde), 4.1(8), PG II	XXX1	DM	XX50	P	D001	D002	
X	2. RQ, UN3266, Waste Corrosive Liquid, Basic, Inorganic, n.o.s., (Potassium Hydroxide), 8, PG II	XXX2	DF	XY30	G	D002		
X	3. UN3262, Corrosive Solids, Basic, Inorganic, n.o.s., (contains sodium hydroxide), 8, PG II	XXX1	DF	XXX15	P	NONE		
	4.							
14. Special Handling Instructions and Additional Information a) ERG# 134 (FORMALDEHYDE SOAKED RAGS) Approval # E124184DE1 b) ERG# 154 (ALKALINE LIQUID, DRIP PAN WASTE) Approval # E102045DET c) ERG# 154 (CAUSTIC SOAKED ABSORBENTS) Approval # E124184DE1 Bill to: Elk Environmental D10503A2 / 120246								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name Tony Swetz				Signature 		Month Day Year 5 7 12		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Andres Ortiz				Signature 		Month Day Year 05 07 12		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:						U.S. EPA ID Number		
18b. Alternate Facility (or Generator)								
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H111		2. H111		3. H111		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name Julio Herrlich				Signature 		Month Day Year 5 16 12		



Land Disposal Restriction & Certification Form

Please check the appropriate facility:

<input type="checkbox"/> Michigan Disposal Waste Treatment Plant	49350 N. I-94 Service Drive, Belleville, MI 48111	EPA ID # MID 000 724 831
<input type="checkbox"/> Wayne Disposal, Inc. Site #2 Landfill	49350 N. I-94 Service Drive, Belleville, MI 48111	EPA ID # MID 048 090 633
<input checked="" type="checkbox"/> EQ Detroit, Inc.	1923 Frederick Street, Detroit, MI 48211	EPA ID # MID 980 991 566
<input type="checkbox"/> EQ Resource Recovery, Inc.	36345 Van Born Road, Romulus, MI 48174	EPA ID # MID 060 975 844
<input type="checkbox"/> EQ North Carolina	1005 Investment Blvd, Apex, NC 27502	EPA ID # NCD 982 170 292
<input type="checkbox"/> EQ Florida, Inc.	7202 East 8 th Ave, Tampa, FL 33619	EPA ID # FLD 981 932 494

Generator Name: Dial Corporation U.S. EPA ID No.: PAD 987 271 012

Generator Address: 125 Jaycee Drive, West Hazleton, PA 18202

State Manifest No.: _____ Manifest Doc. No.: 009543755 JJK

Instructions

Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.

Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).

Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c) - soil, or 268.45 - debris.

Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.

Column 5: For F001 - F005, F039, D001 - D043, Debris and Contaminated Soil: please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the EQ Resource Guide, LDR/UHC Constituent Table.

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed?	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris wastes.
11A	D001, D002	NWW		A	
11B	D002	NWW		A	
11C	NONE	NWW			
11D					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: _____

Title: _____

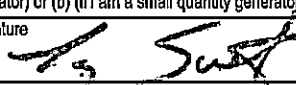
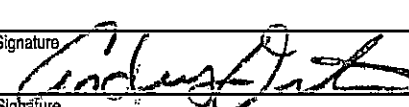
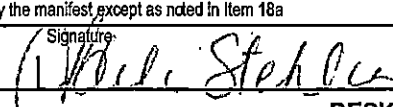
Printed Name: _____

Date: _____

How Must the Waste Be Managed?

S. THIS CONTAMINATED SOIL DOES / DOES NOT CONTAIN LISTED HAZARDOUS WASTE AND DOES / DOES NOT EXHIBIT A
(CIRCLE ONE) CHARACTERISTIC OF HAZARDOUS WASTE AND IS SUBJECT TO / COMPLIES WITH THE SOIL TREATMENT STANDARDS
(CIRCLE ONE)

AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 020	2. Page 1 of 1 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 009543200 JJK		
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DRIVE WEST HAZLETON, PA 18202		Generator's Site Address (if different than mailing address)					
Generator's Phone: 570-455-8980							
6. Transporter 1 Company Name ELK TRANSPORTATION, INC.		U.S. EPA ID Number PAD 987 271 020					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address CYCLE CHEM, INC. 550 INDUSTRIAL DRIVE LEWISBERRY, PA 17339		U.S. EPA ID Number PAD 067 098 822					
Facility's Phone: 717-938-4700							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. RQ, UN3264, Waste Corrosive Liquid, Acidic, Inorganic, n.o.s. (Phosphoric Acid), 8, PG II	XX2	DF	XX40	G	D002	
X	2. RQ, UN3266, Waste Corrosive Liquid, Basic, Inorganic, n.o.s. (Sodium Hydroxide), 8, PG II	XX3	DF	X150	G	D002	
	3.						
	4.						
14. Special Handling Instructions and Additional Information							
a) ERG# 154 (CAN-CP-450)				Approval #		Bill To: Elk Environmental	
b) ERG# 157 (Offspec Basic AES Sludge)				Approval #		DI0717A2 / 120246	
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Tony Swartz				Signature 		Month Day Year 8 10 12	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Andres Ortiz				Signature 		Month Day Year 8 10 12	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: _____							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141		2. H141		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Adele Stehley				Signature 		Month Day Year 08 11 12	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012		2. Page 1 of 1	3. Emergency Response Phone 800-4851-7156		4. Manifest Tracking Number 011074395 JJK		
		5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DRIVE WEST HAZELTON, PA 18202 570-455-9980		Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name ELK TRANSPORTATION, INC.		U.S. EPA ID Number PAD 987 271 020							
7. Transporter 2 Company Name		U.S. EPA ID Number							
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK STREET DETROIT, MI 48211 313-347-1300		U.S. EPA ID Number MID 980 991 566							
Facility's Phone:									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	RQ, UN3264, Waste Corrosive Liquid, Acidic, Inorganic, n.o.s., (Sulfuric Acid), 8, PG II			X 18 TP		4,500	G	3002
14. Special Handling Instructions and Additional Information (c) ERG 154 (Acidic AES Solution) Approval # L102070DET									
Bill to: Elk Environmental DI0404A3 / 120246									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offor's Printed/Typed Name Tony Swetz		Signature <i>[Signature]</i>		Month 4		Day 25		Year 13	
16. International Shipments <input type="checkbox"/> Import to U.S. Transporter signature (for exports only):		<input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name Jason Comett		Signature <i>[Signature]</i>		Month 4		Day 25		Year 13	
Transporter 2 Printed/Typed Name		Signature		Month		Day		Year	
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number:									
18b. Alternate Facility (or Generator) U.S. EPA ID Number									
Facility's Phone:									
18c. Signature of Alternate Facility (or Generator) Month Day Year									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. H110 2. 3. 4.									
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Wm. Birch Signature <i>[Signature]</i> Month 4 Day 25 Year 13									

**GENERATORS NOTIFICATION OF TREATMENT REQUIREMENTS FOR WASTES
RESTRICTED FROM LAND DISPOSAL UNDER 40 CFR 268 SUBPART D**

MANIFEST NUMBER: 011074480JJK

EPA ID NUMBER: PAD 987 271 012

EPA WASTE CODE: F003, D001

PROFILE NUMBER: 117442

WASTE CATEGORY [Check appropriate line(s)]

☐ **Unrestricted Waste Notification**

The disposal of this waste is not restricted as specified in 40 CFR 268, subpart D and all prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

☒ **Restricted Waste Notification**

- A ☐ This is a restricted waste which meets the treatment standards as specified in 40 CFR 268, Subpart D.
- B ☒ This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated to the appropriate standard and in such a manner which renders it non-liquid by chemical fixation or solidification prior to land disposal. [See treatment standard below or see attached Part II section(s).]
- C ☐ This shipment includes RCRA Section 3004(d) California list wastes. Circle or otherwise indicate individual constituents likely to be present in the waste.

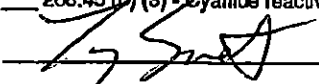
EPA CODES	SUBCATEGORY or WASTE DESCRIPTION	CONSTITUENT CONCERN	NON-WASTEWATER		WASTEWATER
			TOTAL COMPOSITION (mg/kg)	TCLP (mg/L)	TOTAL COMPOSITION (mg/L)
CALIFORNIA LISTED WASTE LAND DISPOSAL PROHIBITION LEVELS					
<input type="checkbox"/>	Arsenic bearing liquid wastes	Arsenic (As)	500		
<input type="checkbox"/>	Cadmium bearing liquid wastes	Cadmium (Cd)	100		
<input type="checkbox"/>	Chromium bearing liquid waste	Chromium (Cr)	500		
<input type="checkbox"/>	Lead bearing liquid wastes	Lead (Pb)	500		
<input type="checkbox"/>	Nickel bearing liquid wastes	Nickel (Ni)	100		
<input type="checkbox"/>	Mercury bearing liquid wastes	Mercury (Hg)	20		
<input type="checkbox"/>	Selenium bearing liquid wastes	Selenium (Se)	100		
<input type="checkbox"/>	Thallium bearing liquid wastes	Thallium (Th)	130		
<input type="checkbox"/>	PCB bearing liquid wastes	Polychlorinated Biphenyls	50		
<input type="checkbox"/>	Cyanide bearing liquid wastes	Cyanide (Total)	1000		
<input type="checkbox"/>	Liquid wastes with a pH ≤2.0		pH ≤2.0		
<input type="checkbox"/>	HOC bearing liquid wastes	HOCs listed below	1000		

- D ☐ This shipment includes hazardous debris. (Check certification B or C)

As required by 40 CFR 268.7(a)(2), the following certification is made for these restricted wastes: (Check One)

- A ☐ I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- B ☒ I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is subject to the treatment standards, specified in 40 CFR 268 subpart D. Waste must be treated to the appropriate regulatory treatment standard, by the appropriate regulatory treatment method.
- C ☐ This hazardous debris is subject to the alternate treatment standards of 40 CFR 268.45. The waste contains the following contaminants subject to treatment. (Check all that apply).
- ____ 268.45 (b) (1) - Toxicity characteristic debris
- ____ 268.45 (b) (2) - Debris contaminated with listed waste
- ____ 268.45 (b) (3) - Cyanide reactive debris

SIGNATURE



TITLE

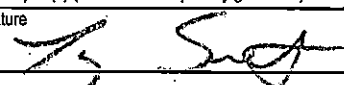

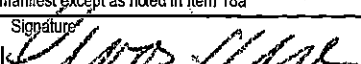
Fac Man/H/Env TL

GENERATOR NAME/LOCATION: Dial Corp., 125 Jaycee Drive, West Hazelton, PA 18202

NOTE: PLEASE ATTACH WASTE ANALYSIS DATA. (OPTIONAL) DATE: 4/25/13

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PA0987271020	2. Page 1 of 1	3. Emergency Response Phone 908-354-0210	4. Manifest Tracking Number 011694241 JJK		
5. Generator's Name and Mailing Address DIAL CORP DE WEST HAZELTON PA				Generator's Site Address (if different than mailing address) SAME			
Generator's Phone: 570-455-9980 J. Sarmick							
6. Transporter 1 Company Name CLEAN VENTURE INC.				U.S. EPA ID Number NJ0000027193			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address 217 SOUTH FIRST ST ELIZABETH NEW JERSEY 07206				U.S. EPA ID Number NJ0002200076			
Facility's Phone: 908-355-5800							
GENERATOR	9a. HM:	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
			No.	Type			
		1. UN3264 LIQUID CORROSIVE	XXI	TT	1750	G	2002
		Liquid, Acidic, Organic, N.O.D.					
		2. CLASS 8 BOTTLE					
14. Special Handling Instructions and Additional Information 308-10556049-01-09 EMERGENCY PHONE 908-354-0210 TRUCK 128 968394- EAG154 PCUSAL-01 MARC SANTORA PLATE AN197A DEC 9 407955							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name X Tony Swetz				Signature X TS Swetz		Month Day Year 1 10 14	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
	Transporter signature (for exports only):						
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name WRE C Lindsey				Signature [Signature]		Month Day Year 1 10 14
	Transporter 2 Printed/Typed Name				Signature		Month Day Year
	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
	18c. Signature of Alternate Facility (or Generator) Month Day Year						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H110	2.	3.	4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name Helen Ellis				Signature Helen Ellis		Month Day Year 10 10 14

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 012187413 JJK		
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DRIVE WEST HAZELTON, PA 18202		Generator's Site Address (if different than mailing address)					
Generator's Phone: 570-455-9980							
6. Transporter 1 Company Name ELK TRANSPORTATION, INC.				U.S. EPA ID Number PAD 987 271 020			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK STREET DETROIT, MI 48211				U.S. EPA ID Number MI0 980 991 566			
Facility's Phone: 313-347-1300							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	X	1. RQ, UN3264, Waste Corrosive Liquid, Acidic, Inorganic, n.o.s., (Sulfuric Acid), 8, PG II	X17	TP	X4625	G	D002
14. Special Handling Instructions and Additional Information a) ERG 154 (Acidic AES Solution) Approval # L102070DET							
Bill to: Elk Environmental							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Tony Smith				Signature <i>T. Smith</i>		Month Day Year 10 10 14	
INT'L	16. International Shipment: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name Brian Ravenzahn				Signature <i>B. Ravenzahn</i>		Month Day Year 10 10 14
	Transporter 2 Printed/Typed Name				Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
	1. H10	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name Doreen McClellan				Signature <i>D. McClellan</i>		Month Day Year 1 13 14	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD 987 271 012	2. Page 1 of 1	3. Emergency Response Phone 800-851-7156	4. Manifest Tracking Number 012187425 JJK		
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DRIVE WEST HAZELTON, PA 18202				Generator's Site Address (if different than mailing address)			
Generator's Phone: 670-456-8980							
6. Transporter 1 Company Name ELK TRANSPORTATION, INC.				U.S. EPA ID Number PAD 987 271 020			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK STREET DETROIT, MI 48211				U.S. EPA ID Number MID 980 991 566			
Facility's Phone: 313-347-1300							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	X	RQ, UN3264, Waste Corrosive Liquid, Acidic, Inorganic, n.o.s., (Sulfuric Acid), 8, PG II	17	TP	4,625 <i>16075 LBS</i>	G	D002
14. Special Handling Instructions and Additional Information a) ERG2 154 (Acidic AES Solution) Approval # L102070DET							
Bill to: Elk Environmental							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Tony Schetz				Signature 		Month Day Year 10/10/14	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Paul Everland			Signature 		Month Day Year 1/10/14	
	Transporter 2 Printed/Typed Name			Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
	18c. Signature of Alternate Facility (or Generator)						Month Day Year
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H110	2.	3.	4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name YRCAO UNCLINT			Signature 		Month Day Year 11/13/14	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PA0987271012	2. Page 1 of 1	3. Emergency Response Phone (877) 577-2669	4. Manifest Tracking Number 008210118 FLE	
5. Generator's Name and Mailing Address OTAL CORPORATION 125 JAYCEE DR ATTN: TONY SMETZ Generator's Phone: W. HAZELTON PA 18201 (570)455-9980			Generator's Site Address (if different than mailing address) OTAL CORPORATION 125 JAYCEE DR -- W. HAZELTON PA 18201 (570)455-9980/105			
6. Transporter 1 Company Name REPUBLIC ENV SYS (TRANS GROUP) LLC			U.S. EPA ID Number PA0982661381			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address ENVIRITE COMPANY OF PA INC 750 VOGELSONG ROAD Facility's Phone: WARE, PA 17404 (717) 866-1900			U.S. EPA ID Number PA0010154045			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
1	UN3260 HAZARDOUS SOLID, ACIDIC, INORGANIC, H.O.S. (SULFURIC ACID) 9 P001	X17 X20 TP		44200	P	0002
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information 177 160152EPA-00 - E661541 (ENVIRITE-PA) OFF SF						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable International and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Tony Smetz		Signature Tony Smetz		Month Day Year 06/01/15		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Jose Rodriguez		Signature Jose Rodriguez		Month Day Year 06/01/15		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H110	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name JAMES TOWNSELEK		Signature J		Month Day Year 06/01/15		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 000007271012	2. Page 1 of 1	3. Emergency Response Phone (877) 577-2669	4. Manifest Tracking Number 007675178 FILE	
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DR RTIN; TONY SWEIZ Generator's Phone: W. HAZELTON PA 18201 (570) 455-9980			Generator's Site Address (if different than mailing address) DIAL CORPORATION 125 JAYCEE DR W. HAZELTON PA 18201 (570) 455-9980			
6. Transporter 1 Company Name ENVIRONMENTAL PRODS & SERVICES OF VT			U.S. EPA ID Number NYR000115733			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address EXCLUSIVE CONTRACT OF PA INC 730 POOLBORO ROAD Facility's Phone: TOWN PA 17404 (717) 846-1969			U.S. EPA ID Number PA0010154045			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	UNL3260 WASTE CORROSIVE SOLID, ACIDIC, INORGANIC, P.O.S. (SULFURIC ACID) & POH	1 35 FT		14.220 49.920	P	D002
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information (1) T001062EPA-00 - EAG(154) (SERVICE-PA) OFF SP 14620LBS						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name Tony Sweiz		Signature Tony Sweiz		Month Day Year 16 29 15		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Buckman E. F...		Signature Buckman E. F...		Month Day Year 6 29 15		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (of Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H110	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name JAMES TOWNSELY		Signature J		Month Day Year 06 30 15		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number: PAD987271012	2. Page 1 of 1	3. Emergency Response Phone: (877) 577-2669	4. Manifest Tracking Number: 008947562 FLE	
5. Generator's Name and Mailing Address: OTAL CORPORATION 125 WAYCEE DR. ATTN: TONY SWETZ W. HAZELTON PA 18201 (570)455-9980			Generator's Site Address (if different than mailing address): OTAL CORPORATION 125 WAYCEE DR W. HAZELTON PA 18201 (570)455-9980x105.			
6. Transporter 1 Company Name: ACERIFIC ENV SYS (TRANS GROUP) LLC			U.S. EPA ID Number: PAD982661381			
7. Transporter 2 Company Name:			U.S. EPA ID Number:			
8. Designated Facility Name and Site Address: CHRYSTIE COMPANY OF PA INC 730 ROSELSON RD TOWNSHIP PA 17144 (717) 945-1900			U.S. EPA ID Number: PAD010154045			
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.
			No.	Type		
	X	1. UNCLASD WASTE CORROSIVE SOLID, ACIDIC, INORGANIC, N.O.S. (SOLUBLE) ACID 9.5011 PA	017	TP	4420	G
		2.				
		3.				
		4.				
14. Special Handling Instructions and Additional Information: TO TOWNSHIP PA (570)455-9980 (717) 945-1900						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offoror's Printed/Typed Name: Tony Swetz			Signature: Tony Swetz		Month Day Year: 08/26/15	
TRANSPORTER	16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:					
	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name: Steven Plonky			Signature: [Signature]		Month Day Year: 08/26/15
	Transporter 2 Printed/Typed Name:			Signature:		Month Day Year:
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number:					
	18b. Alternate Facility (or Generator): U.S. EPA ID Number:					
	Facility's Phone:					
	18c. Signature of Alternate Facility (or Generator): Month Day Year:					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H110		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name: JAMES TOWNSLEY			Signature: JAM		Month Day Year: 08/26/15	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PAD987271012	2. Page 1 of 1	3. Emergency Response Phone (877) 577-2669	4. Manifest Tracking Number 009463724 FLE		
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DR. ATTN: TONY SWETZ N. HAZLETON PA 18201 (570)455-9980			Generator's Site Address (if different than mailing address) DIAL CORPORATION 125 JAYCEE DR N. HAZLETON PA 18201 (570)455-9980x105				
6. Transporter 1 Company Name REPUBLIC ENV SYS (TRANS GROUP) LLC			U.S. EPA ID Number PAD982661381				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address REPUBLIC ENV SYS (PA) LLC 2869 SANDSTONE DRIVE WATFIELD, PA 15440 (215) 822-8995			U.S. EPA ID Number PAD085690592				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
X	1. UN1993 HAZ. FLAMMABLE LIQUIDS, N.O.S. (METHYL ISOBUTYL KETONE, CHLOROFORM) 3 PGII RQ(0001)	002	DM	0600	P	0001	0002 0022
X	2. UN1993 HAZ. FLAMMABLE LIQUIDS, N.O.S. (METHANOL) 3 PGII RQ(0001)	001	DM (CF) DF	0080	P	0001	
X	3. UN2735 HAZ. OXIDIZING, LIQUID, CORROSIVE, N.O.S. (DIETHYLENE TRIAMINE) 8 PGII RQ(0002)	002	DM (CF) DF	0300	P	0002	
	4. NON HAZARDOUS, NON REGULATED MATERIAL	001	DM (CF) CF	1200	P		
14. Special Handling Instructions and Additional Information (1) 686009-00 - ER6(128) LAB SOLVENTS (2) 750712-00 - ER6(128) LOOSEPACK-FLAMMABLE (3) 750719-00 - ER6(153) LOOSEPACK-HARDENERS (4) 750728-00 - LOOSEPACK-HARDENERS							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Tony Swetz				Signature 		Month Day Year 02 23 16	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Kyle Tice Signature Month Day Year 02 23 16 Transporter 2 Printed/Typed Name Signature Month Day Year							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. H141 3. H141 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name MALWA AUTKA Signature Month Day Year 02 29 16							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PA090771012	2. Page 1 of 1	3. Emergency Response Phone (877) 577-2664	4. Manifest Tracking Number 009416670 FLE						
5. Generator's Name and Mailing Address DIAL CORPORATION 125 JAYCEE DR WILK: 1007 B0E12 Generator's Phone: H. HAZLETON PA 18061 (570) 455-9980				Generator's Site Address (if different than mailing address) DIAL CORPORATION 125 JAYCEE DR H. HAZLETON PA 18061 (570) 455-9980x105							
6. Transporter 1 Company Name REPUBLIC ENV SYS (TRANS GROUP) LLC				U.S. EPA ID Number PA09082661381							
7. Transporter 2 Company Name				U.S. EPA ID Number							
8. Designated Facility Name and Site Address REPUBLIC ENV SYS (PA) LLC 2869 SANDSTONE DRIVE Facility's Phone: WILKES-PA 19445 (215) 623-0995				U.S. EPA ID Number PA09085690592							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes			
				No.	Type						
	1. 001999 WASTE FLUORESCENT LIGHTS, N.O.S. (CHLOROPHOS, BERYL (SODIUM FLUORESCENT) 3 (011 RQ10001)			2	DM	1000	P	0001	0022	P003	
	2.										
	3.										
4.											
14. Special Handling Instructions and Additional Information (1) 673301-01 - EPA (128) MIXED SOLVENTS											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Officer's Printed/Typed Name Tom S. Smith				Signature 		Month 5		Day 5		Year 16	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:											
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Kortell Ann Signature Month 5 Day 5 Year 16 Transporter 2 Printed/Typed Name Signature Month Day Year											
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.											
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a. Printed/Typed Name Signature Month Day Year											

Serfass, Rebecca

From: Terry Hartlage <terry.hartlage@henkel.com>
Sent: Thursday, June 02, 2016 3:28 PM
To: Serfass, Rebecca
Cc: Janine Surmick
Subject: Response to Visit at The Dial Corporation, a Henkel Company Site in West Hazleton, PA
Attachments: removed.txt

Dear Rebecca,

Thank you for your visit to our facility. Below you will find responses to the housekeeping items you identified while on site. Based on your suggestion, we wanted to provide you documentation of our actions and resolution to the observations. If you have any questions regarding the information provided below, please contact us immediately.

Sincerely, Terry Hartlage

Terry Hartlage, Plant Manager
The Dial Corporation, a Henkel Company
125 Jaycee Drive
West Hazleton, PA 18202
570-450-2131

1. Observation: Totes are used to collect non-hazardous AES from sampling of the skid or tank wagon. During the inspection, one tote was observed to have a non-hazardous waste label while the other, which appeared to contain the same material, did not.
 - *Response: The content of the unlabelled tote was confirmed to be non-hazardous AES. The observation was corrected by affixing a non-hazardous label to the container. Below are photos of the condition both before and after the label was applied.*

* Before



After



* See Photo #^s 4 and 6 of Inspection Report for "Before" photos. RUS 6/2/16

2. Observation: The bottom of the containment pallet for storage of AES sampling buckets had some residual material in it. Similarly there was some dry material on the floor in the Beauty Care raw material storage area which was identified as Sodium Benzoate. The inspectors stated that employees

should have an understanding of what the residual/uncontainerized material waste is, if it is hazardous and how it should be managed by those working in the area.

- *Response: Both observed materials are related to small spills or drips of raw materials used in the production areas and are classified as non-hazardous. Employees are trained in the proper handling of materials in their work areas annually and when new chemicals are introduced. The observation were addressed by cleaning the AES container and floor around the Sodium Benzoate.*

AES Small Container Storage Pallet

Before



After



Sodium Benzoate Staging Area

Before



After



3. Observation: There are two aerosol disposal containers at the site had an opening in the lid to drop the can in for disposal.

- *Response: Empty (used) aerosol cans at the site are collected, punctured (depressurized) and ultimately sent to a metals recycler. The accumulated content of or residual material from the used aerosol cans after they are punctured is collected in a drum and ultimately sent for disposal as hazardous waste. There is a document procedure for this task. The aerosol can collection containers observed now have a lid without an "opening".*

Before - Disposal Container

After – Disposal Container



4. Observation: The collection container for used oil is open to the environment and must be closed when not transferring oil into it.

- *Response: The site collects used oil in two locations. One is in the battery charging area in Customer Service and the other one is located in the Maintenance Shop. The containers in the battery charging area are contained within a storage "clamshell" that is closed except when material is added to or taken from the container. Both the containers in the battery charging area and maintenance shop had funnel that covered the container opening (or bung), but said funnels did not covers. Funnels with a hinged lid have been added on all waste oil drums in use at the site.*

Before



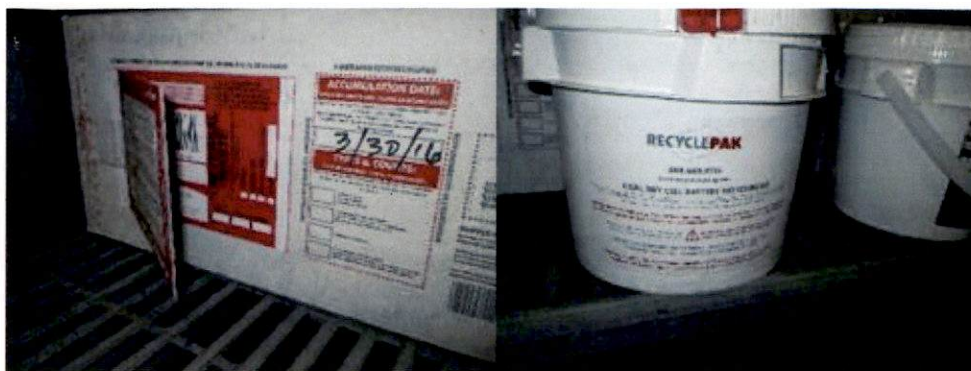
After



5. Observation: The containers for universal waste are not clearly labelled as "universal waste". The reference to universal waste is only located on the shipping label. The label is not visible until the shipping information is revealed and completed.

- *Response: All universal waste containers at the site are properly labelled. However, additional steps have been taken to ensure that universal waste container content is clearly visible. The site has also updated its procedure for universal waste management to incorporate this change and it will be included in the annual training program.*

Before



After



West Hazleton Plant Manager
Henkel Corporation

125 Jaycee Drive
West Hazleton, PA 18202
570-450-2131
Email: terry.hartlage@henkel.com
Web: <http://henkelna.com>

IMPORTANT NOTICE: This message may contain confidential and/or privileged information. If you are not the intended recipient, please do not use its contents for any purpose, advise the sender immediately by reply e-mail and delete this message and any attachments without retaining any copy.

Res 5/17/16
Attachment N



SAFETY DATA SHEET

Linx Solvent 1590

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product name Linx Solvent 1590

Product number 1590

1.2. Relevant identified uses of the substance or mixture and uses advised against

Identified uses Printing ink. Cleaning agent.

1.3. Details of the supplier of the safety data sheet

Supplier Linx Printing Technologies Ltd
Linx House
8 Stocks Bridge Way
Compass Point Business Park
ST IVES
Cambridgeshire PE27 5JL
UK
T: +44 (0)1480 302100 Mon-Fri 9am-5pm
F: +44 (0)1480 302116
E-mail: SDS@Linx.co.uk Web: www.linxglobal.com

1.4. Emergency telephone number

Emergency telephone 24HR: (+1)-352-323-3500; USA 1-800-535-5053

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification

Physical hazards Flam. Liq. 2 - H225

Health hazards Eye Irrit. 2 - H319 STOT SE 3 - H336

Environmental hazards Not Classified

Classification (67/548/EEC or 1999/45/EC) Xi;R36. F;R11. R66,R67.

2.2. Label elements

Pictogram



Signal word Danger

Hazard statements
H225 Highly flammable liquid and vapour.
H319 Causes serious eye irritation.
H336 May cause drowsiness or dizziness.

Linx Solvent 1590

Precautionary statements

P210 Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

P271 Use only outdoors or in a well-ventilated area.

P280 Wear protective gloves/protective clothing/eye protection/face protection.

P305+P351+P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P313 Get medical advice/attention.

P501 Dispose of contents/container in accordance with national regulations.

Supplemental label Information EUH066 Repeated exposure may cause skin dryness or cracking.

Contains BUTANONE

Supplementary precautionary statements

P240 Ground/bond container and receiving equipment.

P241 Use explosion-proof electrical equipment.

P242 Use only non-sparking tools.

P243 Take precautionary measures against static discharge.

P261 Avoid breathing vapour/spray.

P264 Wash contaminated skin thoroughly after handling.

P303+P361+P353 IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.

P304+P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing.

P312 Call a POISON CENTER/doctor if you feel unwell.

P337+P313 If eye irritation persists: Get medical advice/attention.

P370+P378 In case of fire: Use foam, carbon dioxide, dry powder or water fog to extinguish.

P403+P233 Store in a well-ventilated place. Keep container tightly closed.

P403+P235 Store in a well-ventilated place. Keep cool.

P405 Store locked up.

2.3. Other hazards

SECTION 3: Composition/Information on Ingredients

3.2. Mixtures

BUTANONE			80-100%
CAS number: 78-93-3	EC number: 201-159-0	REACH registration number: 01-2119457290-43-XXXX	
Classification		Classification (67/548/EEC or 1999/45/EC)	
Flam. Liq. 2 - H225		F;R11 Xi;R36 R66 R67	
Eye Irrit. 2 - H319			
STOT SE 3 - H336			
PROPAN-1-OL			1-5%
CAS number: 71-23-8	EC number: 200-746-9	REACH registration number: 01-2119486761-29-XXXX	
Classification		Classification (67/548/EEC or 1999/45/EC)	
Flam. Liq. 2 - H225		F;R11 Xi;R41 R67	
Eye Dam. 1 - H318			
STOT SE 3 - H336			

The Full Text for all R-Phrases and Hazard Statements are Displayed in Section 16.

Linx Solvent 1590

SECTION 4: First aid measures

4.1. Description of first aid measures

General Information	Get medical attention if any discomfort continues. Never give anything by mouth to an unconscious person.
Inhalation	Move affected person to fresh air at once. If breathing stops, provide artificial respiration. Keep affected person warm and at rest. Get medical attention immediately.
Ingestion	Do not induce vomiting. Rinse mouth thoroughly with water. Give plenty of water to drink. Give milk instead of water if readily available. <u>Never give anything by mouth to an unconscious person.</u> Move affected person to fresh air and keep warm and at rest in a position comfortable for breathing. Get medical attention immediately.
Skin contact	Remove contaminated clothing. Wash skin thoroughly with soap and water. Get medical attention if irritation persists after washing.
Eye contact	Remove any contact lenses and open eyelids wide apart. Continue to rinse for at least 15 minutes and get medical attention.

4.2. Most important symptoms and effects, both acute and delayed

General Information	The severity of the symptoms described will vary dependent on the concentration and the length of exposure.
Inhalation	Vapours may cause headache, fatigue, dizziness and nausea. Irritation of nose, throat and airway.
Ingestion	May cause stomach pain or vomiting.
Skin contact	Prolonged contact may cause redness, irritation and dry skin.
Eye contact	May cause temporary eye irritation.

4.3. Indication of any immediate medical attention and special treatment needed

Notes for the doctor	No specific recommendations. If in doubt, get medical attention promptly.
-----------------------------	---

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media	Extinguish with the following media: Alcohol-resistant foam. Carbon dioxide (CO ₂). Water spray, fog or mist. Powder.
Unsuitable extinguishing media	Do not use water jet as an extinguisher, as this will spread the fire.

5.2. Special hazards arising from the substance or mixture

Specific hazards	The product is highly flammable. Vapours may form explosive mixtures with air. Vapours are heavier than air and may spread near ground and travel a considerable distance to a source of ignition and flash back.
Hazardous combustion products	Oxides of carbon. Oxides of nitrogen.

5.3. Advice for firefighters

Protective actions during firefighting	Control run-off water by containing and keeping it out of sewers and watercourses. Containers close to fire should be removed or cooled with water.
Special protective equipment for firefighters	Wear positive-pressure self-contained breathing apparatus (SCBA) and appropriate protective clothing.

Linx Solvent 1590

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Personal precautions Wear protective clothing as described in Section 8 of this safety data sheet. Do not breathe vapour. Provide adequate ventilation. Use suitable respiratory protection if ventilation is inadequate.

6.2. Environmental precautions

Environmental precautions Do not discharge into drains or watercourses or onto the ground.

6.3. Methods and material for containment and cleaning up

Methods for cleaning up Eliminate all sources of ignition. No smoking, sparks, flames or other sources of ignition near spillage. Provide adequate ventilation. Contain spillage with sand, earth or other suitable non-combustible material. Avoid the spillage or runoff entering drains, sewers or watercourses. Wear suitable protective equipment, including gloves, goggles/face shield, respirator, boots, clothing or apron, as appropriate. Absorb spillage with non-combustible, absorbent material. Collect and place in suitable waste disposal containers and seal securely.

6.4. Reference to other sections

Reference to other sections For personal protection, see Section 8. For waste disposal, see section 13.

SECTION 7: Handling and storage

7.1. Precautions for safe handling

Usage precautions Keep away from heat, sparks and open flame. Static electricity and formation of sparks must be prevented. Avoid spilling. Avoid contact with skin and eyes. Provide adequate ventilation. Avoid inhalation of vapours. Use approved respirator if air contamination is above an acceptable level. Vapours may accumulate on the floor and in low-lying areas. Contaminated rags and cloths must be put in fireproof containers for disposal.

7.2. Conditions for safe storage, including any incompatibilities

Storage precautions Keep away from oxidising materials, heat and flames. Store in tightly-closed, original container in a dry, cool and well-ventilated place. May attack some plastics, rubber and coatings.

Storage class Flammable liquid storage.

7.3. Specific end use(s)

Specific end use(s) The identified uses for this product are detailed in Section 1.2.

SECTION 8: Exposure Controls/personal protection

8.1. Control parameters

Occupational exposure limits

BUTANONE

Long-term exposure limit (8-hour TWA): WEL 200 ppm 600 mg/m³

Short-term exposure limit (15-minute): WEL 300 ppm 899 mg/m³

Sk

PROPAN-1-OL

Long-term exposure limit (8-hour TWA): WEL 200 ppm 500 mg/m³

Short-term exposure limit (15-minute): WEL 250 ppm 625 mg/m³

Sk

WEL = Workplace Exposure Limit

Sk = Can be absorbed through the skin.

Linx Solvent 1590

8.2. Exposure controls

Protective equipment



Appropriate engineering controls

Provide adequate ventilation. Avoid inhalation of vapours. Observe any occupational exposure limits for the product or ingredients.

Eye/face protection

Wear chemical splash goggles.

Hand protection

Chemical-resistant, impervious gloves complying with an approved standard should be worn if a risk assessment indicates skin contact is possible. For exposure up to 4 hours, wear gloves made of the following material: Butyl rubber. It should be noted that liquid may penetrate the gloves. Frequent changes are recommended. The most suitable glove should be chosen in consultation with the glove supplier/manufacturer, who can provide information about the breakthrough time of the glove material. Barrier cream applied before work may make it easier to clean the skin after exposure, but does not prevent absorption through the skin.

Other skin and body protection

Wear appropriate clothing to prevent any possibility of skin contact.

Hygiene measures

Use engineering controls to reduce air contamination to permissible exposure level. Do not smoke in work area. Wash at the end of each work shift and before eating, smoking and using the toilet. When using do not eat, drink or smoke.

Respiratory protection

No specific recommendations. Respiratory protection must be used if the airborne contamination exceeds the recommended occupational exposure limit. Wear a respirator fitted with the following cartridge: Gas filter, type AX.

Environmental exposure controls

Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation.

SECTION 9: Physical and Chemical Properties

9.1. Information on basic physical and chemical properties

Appearance	Clear liquid.
Colour	Colourless.
Odour	Characteristic.
Melting point	-86°C
Initial boiling point and range	80°C @ 760 mm Hg
Flash point	-6°C CC (Closed cup).
Evaporation rate	> BuAc (BuAc=1)
Upper/lower flammability or explosive limits	Lower flammable/explosive limit: 1.8 (%v/v) Upper flammable/explosive limit: 11.5 (%v/v)
Vapour pressure	78 mmHg @ 20°C
Vapour density	2.4
Relative density	0.75 - 0.85 @ 25°C
Solubility(ies)	Slightly soluble in water.
Auto-ignition temperature	515°C

Linx Solvent 1590

Viscosity 0.3 - 1.0 mPa s @ 25°C

9.2. Other Information

Volatility Volatile.

SECTION 10: Stability and reactivity

10.1. Reactivity

Reactivity There are no known reactivity hazards associated with this product.

10.2. Chemical stability

Stability Stable at normal ambient temperatures.

10.3. Possibility of hazardous reactions

Possibility of hazardous reactions Will not polymerise.

10.4. Conditions to avoid

Conditions to avoid Avoid heat, flames and other sources of ignition.

10.5. Incompatible materials

Materials to avoid Strong acids. Strong alkalis. Strong oxidising agents. Strong reducing agents.

10.6. Hazardous decomposition products

Hazardous decomposition products Does not decompose when used and stored as recommended.

SECTION 11: Toxicological Information

11.1. Information on toxicological effects

Inhalation Gas or vapour in high concentrations may irritate the respiratory system. Symptoms following overexposure may include the following: Headache. Fatigue. Nausea, vomiting. Drowsiness, dizziness, disorientation, vertigo.

Ingestion Liquid irritates mucous membranes and may cause abdominal pain if swallowed. Nausea, vomiting. Diarrhoea.

Skin contact Product has a defatting effect on skin. Repeated exposure may cause skin dryness or cracking.

Eye contact Irritating to eyes. Vapour or spray may cause temporary (reversible) eye damage.

SECTION 12: Ecological Information

Ecotoxicity The product is not expected to be hazardous to the environment.

12.1. Toxicity

Toxicity See the other subsections of this section for further details.

12.2. Persistence and degradability

Persistence and degradability No data available.

12.3. Bioaccumulative potential

Bioaccumulative potential No data available on bioaccumulation.

12.4. Mobility in soil

Linx Solvent 1590

Mobility The product contains organic solvents which will evaporate easily from all surfaces.

12.5. Results of PBT and vPvB assessment

Results of PBT and vPvB assessment This product does not contain any substances classified as PBT or vPvB.

12.6. Other adverse effects

Other adverse effects None known.

SECTION 13: Disposal considerations

13.1. Waste treatment methods

General information When handling waste, the safety precautions applying to handling of the product should be considered. Materials such as cleaning rags and paper wipes that are contaminated with flammable liquids may self-ignite after use and should be stored in designated fireproof containers with tight-fitting, self-closing lids.

Disposal methods Dispose of waste to licensed waste disposal site in accordance with the requirements of the local Waste Disposal Authority. Absorb in vermiculite, dry sand or earth and place into containers. Dispose of waste via a licensed waste disposal contractor.

Waste class European Waste Catalogue Number (2000/532/EC): 08 03 12

SECTION 14: Transport information

14.1. UN number

UN No. (ADR/RID) 1210

UN No. (IMDG) 1210

UN No. (ICAO) 1210

14.2. UN proper shipping name

Proper shipping name (ADR/RID) PRINTING INK RELATED MATERIALS

Proper shipping name (IMDG) PRINTING INK RELATED MATERIALS

Proper shipping name (ICAO) PRINTING INK RELATED MATERIALS

Proper shipping name (ADN) PRINTING INK RELATED MATERIALS

14.3. Transport hazard class(es)

ADR/RID class 3 - F1

ADR/RID label 3

IMDG class 3

ICAO class/division 3

Transport labels



14.4. Packing group

ADR/RID packing group II

Linx Solvent 1590

IMDG packing group II

ICAO packing group II

14.5. Environmental hazards

Environmentally hazardous substance/marine pollutant

No.

14.6. Special precautions for user

EmS F-E, S-D

Emergency Action Code 3YE

14.7. Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code

Transport in bulk according to Not applicable.

Annex II of MARPOL 73/78
and the IBC Code

SECTION 15: Regulatory Information

15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture

National regulations Control of Substances Hazardous to Health Regulations 2002 (as amended).

EU legislation Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) (as amended).
Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures (as amended).

Guidance Workplace Exposure Limits EH40.
Introduction to Local Exhaust Ventilation HS(G)37.

Authorisations (Title VII
Regulation 1907/2006) No specific authorisations are known for this product.

Restrictions (Title VIII
Regulation 1907/2006) No specific restrictions on use are known for this product.

Water hazard classification WGK 1

15.2. Chemical safety assessment

No chemical safety assessment has been carried out.

SECTION 16: Other Information

Revision date 10/05/2015

Revision 12

Supersedes date 06/11/2013

SDS number 10257

Risk phrases in full R11 Highly flammable.
R36 Irritating to eyes.
R41 Risk of serious damage to eyes.
R66 Repeated exposure may cause skin dryness or cracking.
R67 Vapours may cause drowsiness and dizziness.

Linx Solvent 1590

Hazard statements in full

H225 Highly flammable liquid and vapour.

H318 Causes serious eye damage.

H319 Causes serious eye irritation.

H336 May cause drowsiness or dizziness.

This information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process. Such information is, to the best of the company's knowledge and belief, accurate and reliable as of the date indicated. However, no warranty, guarantee or representation is made to its accuracy, reliability or completeness. It is the user's responsibility to satisfy himself as to the suitability of such information for his own particular use.

Rough Draft RLS 6/17/16

Resource Conservation and Recovery Act – Subtitle C

Compliance Evaluation Inspection Report

By: Rebecca Serfass

Dial Corporation

125 Jaycee Drive
West Hazelton, PA 18201

EPA ID No. – PAD987271012

NAICS Code: 325611

“Small Quantity Generator”

Inspection Date: May 17, 2016

EPA Representatives:

Rebecca Serfass, EPA Region III (Lead)
Enforcement Officer
(215) 814-20147

Martin Matlin, EPA Region III
Enforcement Officer
(215) 814-5789

Facility Representatives:

Terry Hartlage, Plant Manager
(570) 450-2131

Janine Surmick, Safety Health & Environmental Quality Manager
(570) 455-9980 ext. 167

Tony Swetz, Environmental Coordinator
(570) 450-2105

Christopher Sweeney, Engineering Manager
(570) 455-2013

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8.0 Add chart?

1.0 Introduction

On May 17, 2016, the United States Environmental Protection Agency, Region III ("EPA") Land and Chemicals Division ("LCD"), Office of Land Enforcement conducted an unannounced Compliance Evaluation Inspection ("CEI") under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. of Dial Corporation ("Dial" or Facility"). EPA LCD Representatives notified Pennsylvania Department of Environmental Protection ("PADEP") of the inspection, ~~but they did not send any representatives.~~ *NO State reps. were present* ✓

Inspectors arrived at the Facility around 9:30AM. There was a sign outside the Facility that said Henkel. Upon entering ~~and~~ ^{The Facility's} inspectors confirmed that Henkel is the parent company that Dial is under and that their official name is Dial Corporation. Inspectors entered the building and were greeted by a security guard who instructed the inspectors to watch a safety video and sign in on the guest log before they could go any further into the Facility. The inspectors were then greeted by Facility representatives, Janine Surmick and Tony Swetz. Inspectors showed them their credentials and shared with them the scope of the inspection. Facility representatives directed inspectors to a conference room where they gathered some background information about the Facility, its processes, and its waste generation.

2.0 Facility Background Information

2.1 Description of Facility *260,000!* ✓

Dial is mainly an antibacterial soap and laundry detergent manufacturer that carries out operations in an approximately 260 ^{square} foot building. The Facility employs about 186 people and operates during 3 shifts, 5 days a week with weekend overtime. The Facility was established in this location in 1988 and has a sister facility in St. Louis, Missouri. Their ~~main customers are distribution centers.~~ *provide the products only to distrib centers* ✓ According to Facility representative, products from this Facility never go directly to customers, but to distribution centers before they are placed in retail stores.

2.2 Facility Permit Status

The Facility currently has a Storm Water Permit and a Waste Water Treatment Permit for the discharge of waste water from cleaning out batch tanks and water that goes down sinks in the Lab. See Records Review section for copy of permit.

WW. ✓

the located

2.3 Process Description

The Facility receives bulk chemical raw materials through a loading dock outside of the Facility. Tanker trucks hook up lines that feed directly into raw material holding tanks for either laundry care or beauty care.

or batch tanks ✓

The Facility's laundry care involves an all automated process of mostly bulk addition of raw materials to product tanks with minor addition for dyes. For beauty care, the Facility employees pre-weigh and stage minor materials that are added into bulk product tanks. Beauty care also involves the addition of chemicals from totes that are either manually added to product mixing tanks, or automatically pumped into tanks.

The Facility includes an upstairs and a downstairs. Downstairs the batch raw materials coming into the Facility are approved and added to bulk mixing tanks. Upstairs the finished products are filled into their appropriate containers, capped, and labeled, before heading back downstairs to the customer service and shipping area.

3.0 Hazardous and Non-Hazardous Waste Generation

- Solvent waste generated in quality testing lab, MIBK, chloroform, ^{and} ethanol used for cleaning and in HPLC machines. ^{including}

- Waste water from cleaning batch tanks and equipment. No solvents used to clean tanks, only hot water or caustic wash. ^{one stream generated from LC, another from B.C.} Collected ~~within tanks in two areas~~, one in beauty care area and one in laundry care area. ^{collected in tanks joined together before...} Joined together through piping and sent across the street to ^{the} sewer authority. Discharge permit with Greater Hazelton Joint Sewer Authority. According to Facility representative, although it is not part of the Facility's Waste Water Permit requirements, sometimes they adjust for pH on site.

- Packaging goods (plastic wrap, plastics containers, cardboard, etc.) all recycled

- Alcohol ethoxysulfate ("AES") – waste generated from AES when raw product becomes acidified due to the chemical's instability. ^{typically either testing or that are} ^{waste} can be HW or Non-HW depending on drop in pH according to FAC.
- Universal waste – including waste lamps and waste batteries

4.0 Facility Generator Status

At the time of the inspection the Facility representatives stated that Dial is a Small Quantity Generator ("SQG"). The Facility notified the state of its SQG status in 1989 and has not sent a subsequent notification to PADEP or the EPA since.

During the opening conference, Facility representative stated that the Facility may go over into Large Quantity Generator Status ("LQG") on occasion due to acidification of AES raw product. See ~~Section 222~~ Uniform Waste Manifest review for more details on Facility waste generation.

7.9

in Records Review Section,

5.0 Hazardous Waste Storage

5.1 Less-Than 180-Day Storage Area

The Facility has one (1) less-than 180-day Hazardous Waste Accumulation Area ("HWAA"). It is a flammable storage cabinet that stores two (2) 55-gallon drums. The HWAA is located on the packaging floor in the upstairs area of the Facility.

See Section 6.7 of Inspection Observations for more details.

5.2 Satellite Accumulation Storage Area

The Facility utilizes Satellite Accumulation Area ("SAA") containers within their quality testing lab. There were five (5) 1-gallon SAA containers within the lab at the time of the inspection.

The Facility also utilizes two (2) SAA containers for collecting waste aerosol cans before they are taken to the Maintenance Shop to be punctured.

See Section 6.7 of Inspection Observations for more details.

5.3 Universal Waste Storage Area

The Facility stores its Universal Waste ("UW") in The Pit / Recycling Area. The UW lamps are stored in cardboard boxes and the UW batteries are stored in plastic buckets. See Inspection Observations for more details.

6.0 Inspection Observations

6.1 Offloading Station

The Facility's Offloading Station is located outside the Facility where bulk tanker trucks can drive up and deliver various raw products. There are a number of manifolds that feed through the wall of the Facility's building near the Offloading Station and lead directly into batch tanks. The main section of the Offloading Station can be seen in Photo #1. Other lines that trucks can connect to near the main station can be seen in Photo #2 and a safety sign posted at the Offloading Station can be seen in Photo #3.

^{ive} Facility represented stated that they rarely clean out the pipe lines leading into the Facility from the Offloading Station because they use the same line for the same product for as long as possible. In the case that the Facility would have to switch lines, they would clean out the line with an appropriate material and send it off as hazardous waste depending on what they used.

either or non-HW.

6.2 Laundry Care Area

Inspectors left the Offloading Station and entered the building through a door that led into the Facility's Laundry Care Area. Upon entering they observed two, 2,500-gallon totes that

(?) #? gal?

contained AES (See Photo #4). The tote on the right was labeled as non-hazardous waste (See Photo #5), while the tote on the left was labeled as "acidic AES" (See Photo #6). According to Facility representatives, the AES waste was generated from routine testing of the raw product. Facility representatives stated that this AES in particular was tested and did not meet product specifications. Although the AES can acidify to the point where it is below a pH of 2 and is considered a hazardous waste, Facility representatives stated that they cannot use the AES if it is below a pH of 8.2 which was the case for these totes. The AES was above a pH of 2, but below a pH of 8.2. *but that they were not below 2.*

Inspectors questioned Facility representatives on whether the AES could acidify further due to its instability and become hazardous. They stated that they will test the material again before it is shipped off site as a waste. Facility representatives also stated that the manufacture of the AES has made some changes to the material in order to make it more stable.

There was a funnel and bucket on top of one of the AES totes (See Photo #7). According to Facility representatives this was used for testing the AES material inside the totes. Similar buckets were seen to the right of the totes turned upside down on a spill container (See Photo #8). A close up of the container can be seen in Photo #9. According to Facility representatives, these buckets are used to test incoming raw material from the tanker trucks before they unload it into the batch tanks. Typically this material is not hazardous, unless the AES has acidified before it arrived to the Facility, in which case inspectors cautioned Facility representatives to treat this waste according if it is ever hazardous. *-ly*

Inspectors walked through the Laundry care area of the Facility and observed many batch tanks. Inspectors asked the Facility representatives how the tanks are cleaned. They stated that they are cleaned regularly with a caustic wash (see Records Review section for SDS). After cleaning the tanks, the caustic wash along with any tank residue is drained into a holding tank *5* before it is sent out to the sewer authority. Waste water from the Laundry Care Area and the Beauty Care Area are combined in this tank before it is sent out. Facility representative stated that the combination of the two waste water streams usually balances out the pH, but that they will add sodium carbonate or citric acid as necessary before sending it off. *through pipes into a final tank*

to bring the pH up or down

6.3 Beauty Care Area

Next, the inspectors entered the raw material storage area for beauty care. Upon entering the storage area, inspectors observed raw product that had some of its contents spilled onto the warehouse floor (See Photo #10). A close-up of this material can be seen in Photo #11. Facility representative said that typically the manager of the area on duty that day will come around and inspect everything and clean up any spills of this type and dispose of the material accordingly.

The rest of the raw product storage area appeared to be managed and organized well and there were no other spills or concerns noted in that area.

6.4 Packaging Area

Upon entering the Packaging area, inspectors observed a plastic cabinet that contains two 55-gallon drums of waste oil (See Photo #12). Inspectors noted that one of the bungs on a waste oil drum was opened (See Photo #13).

Next to the plastic cabinet was a plastic container that was labeled "Empty Aerosol Cans Only". The lid of the container had an open hole in the middle of it (See Photo #14). The Facility accumulates spent aerosol cans in this container before they are taken to the Maintenance Shop off of the Packaging Line to be punctured.

Inspectors observed three beauty packaging lines and 4 laundry packaging lines. The only waste generated in this area, according to Facility representatives, is recyclable material, like excess plastic wrap or a hand soap bottle that fell on the floor. The Facility has large wooden recycling crates near the packaging lines for employees to separate these materials into.

6.5 Shipping Area

Inspectors observed a maintenance shop off of the Shipping Area. Within this maintenance shop was a parts wash station that was labeled with a Crystal Clean logo and according to Facility representatives is managed by Crystal Clean (See Photo #15).

In the Shipping Area, inspectors observed many pallets full of boxed product that were wrapped in tarp. This area contained all products that were ready to be shipped out to one of the four domestic warehouses that this Facility supplies to.

6.6 Lab

Outside of the Facility's quality testing was a washer and dryer. Facility representative stated that these are used to launder rags used for maintenance. ~~They also stated that no solvents are used for these purposes.~~ *on these rags.*

*answered
? Inspector
regarding
lab.* Upon entering the lab, inspectors met the Facility's Lab Quality Manager, Mr. Dan Dule who showed them around. There were five satellite containers in use within the lab at the time of the inspection that were approximately 1 gallon each. Three were labeled as "LC Mobile Phase Waste" and two were labeled as "MIBK/Ethanol Waste" (See Photos #16-20). One of the satellite accumulation containers within a fume hood was open when inspectors observed it, but they did see an employee nearby working who entered the fume hood as the inspectors walked away. *they also saw that to continue his operations with*

The satellite accumulation containers within the lab are used to collect waste coming from the HPLC machines the Facility uses to test product quality. A Facility employee stated that the satellite accumulation containers are usually emptied once or twice a day and are not usually full when they do so. Facility representatives also stated that the sink within the lab are connected to the waste water treatment tank. *and for cleaning or testing purposes w/ fume hoods.*

6.7 Hazardous Waste Accumulation Area

near Inspectors observed the Facility's HWAA to be a flammable storage cabinet against the wall of the packaging lines (See Photo #21). Within the storage cabinet was two 55-gallon drums (See Photo #22). The drum on the left contained hazardous waste, while the drum on the right was empty. They were both labeled as hazardous waste and the drum on the left had a start accumulation date of "5-5-16" (See Photo #23). An addition ^{at} label on the left side drum can be seen in Photo #24.

and was labeled as "Mobile Phase Waste" All waste contained at a HWAA cabinet from

Facility representatives stated that once one of the drums is full, they begin to fill the other one. Once both of them are full, they transfer them ~~to the~~ downstairs ~~down~~ to be shipped. The Facility fills two 55-gallon drums about every two months, or one 55-gallon drum per month.

There was an emergency spill kit located inside of the storage cabinet and emergency information posted outside the side of the cabinet (See Photo #25). A phone was observed nearby.

Next to the HWAA was a second plastic container labeled "Empty Aerosol Cans Only" with a hole in the top of its lid (See Photo #26). Upon opening the container, inspectors observed 2 aerosol cans (See Photo #27).

6.8 Universal Waste Storage Area

The Facility's UW is stored in an area called "The Pit / Recycling Area". Upon entering this area, inspectors observed shelving that contained waste ink on it. Facility representative stated that typically they let the ink evaporate and then it is recycled. Upon inquiring, Facility representatives provided the inspectors with the SDSs for the two types of inks seen on the shelf to confirm that they were not solvent based (See Record Review section for SDSs) (See Photos #28-#31).

Next to the shelf with the waste ink on it was another shelf containing the UW lamps. When the inspector asked the Facility representative to turn the box so that they could look for a start accumulation date, the end of the cardboard box ripped off (See Photo #32). There were three boxes of UW lamps present at the time of the inspection. One had a start date of "12-9-15", one of "3-30-16", and one of "10-6-15". The inspectors looked to see if the boxes were labeled as "Universal Waste" and could not find ^{a label} one initially. Upon looking, Facility representative discovered that the Universal Waste label was located under the shipping label and had not had the "lamp" box checked off (See Photo #33).

On the same shelving was the Facility's UW batteries (See Photo #34). The two buckets seen in Photo #34 were labeled with start accumulation dates of "4/7/16" and "5/9/16" and were labeled as "1 GAL DRY CELL BATTERY RECYCLING KIT" (See Photo #35). The batteries within the buckets were individually bagged. There was an addition ^{at} UW battery bucket on the bottom shelf that according to Facility representatives contained mixed waste batteries (See Photo #36). This bucket did not have a start accumulation date on it.

Also observed in this area were large wooden crates containing separated recyclable material including electric wires, cardboard, and plastic containers. There was an open "Duffy"

trailer connected to the loading dock in this area that the Facility employees fill up and ship off to the recycling company who leave an empty trailer each time. Facility representatives stated that they recycle about 35-40 tons of material per month.

6.9 Maintenance Shop off Packaging Line

Within this additional Maintenance Shop, inspectors observed an aerosol can puncturing unit that was attached to a 35-gallon drum (See Photo #37). There was a start accumulation date of "2/28/16" on the drum (See Photo #38). Facility representative stated that he collects the aerosol cans from the two satellite accumulation containers biweekly and that there is usually 8 or 9 every other week total. There is a bagged liner inside of the drum that collects the aerosol contents when the cans are punctured. A waste oil drum with an open funnel was also observed in this area (See Photos #39 and #40).

Across the room, inspectors observed a flammable cabinet that contained unused or in-use aerosol cans (See Photos #41 and #42).

#41-43

This concluded the Facility tour.

7.0 Records Review

Inspectors asked Facility representatives to see various records for review. The requested documents are as follows:

7.1 ❖ Safety Data Sheet (SDS) for:

- Squid Ink (Attachment A)
- TWP (Attachment B)
- AES (Attachment C)
- Caustic Wash (used to clean batch tanks) (Attachment D)

7.2 ❖ Training records for:

- Dan, 3 years (Attachment E)
- Tony, 3 years (Attachment F)

7.3 ❖ Biennial Report – Facility has never submitted a biennial report according to Facility representatives

7.4 ❖ Contingency Plan – Facility did not have a contingency plan at the time of the inspection. They did have an Emergency Response Plan that they provided to inspectors (Attachment G)

7.5 ❖ Weekly Inspection Logs for Hazardous Waste Accumulation Area (Attachment H)

- 3 years of logs were reviewed

7.8 WWTP Permit add.

- Signed by a ("PO") Patty O'Donnell. Facility did not have training records to Ms. O'Donnell.

7.6 ❖ Bills of Lading ("BOLs") for Universal Waste Shipments (Attachment I)

- 3 years of BOLs for UW shipments were reviewed by inspectors.

7.7 ❖ Proof of Recycling Document for AES (Attachment J)

- Facility representative stated the AES can only be recycled if it comes from a maintenance clean out and has not acidified like the AES that is shipped out as HW on HW Manifests.

7.8 ❖ Hazardous Waste Manifests (Attachment K)

- 5 years of HW Manifests were requested by inspectors. Facility representative stated that the Facility has a 3 year retention policy for HW Manifests and he would bring as far back as they had.
- The "occasional" upset the Facility described when addressing sending acidified AES off as HW appeared on the manifests much more frequently than the Facility representatives had originally described.
- Chart below depicts HW Manifest information from 1-9-12 through 5-5-16

- 7.9
- WWT Permit
- 7.9
- Q
- ❖ Subsequent to the CEI performed at the Facility on 5/17/16, Facility representative sent an email to the EPA documenting the actions they have taken on some of the observations made during the inspection. That email can be seen in Attachment L.

8.0 Post Insp. Info

<u>Manifest #</u>	<u>Date</u>	<u>Amount (G)</u>	<u>Amount (lbs)</u>	<u>Amount (kg)</u>	<u>Waste Code(s)</u>	<u># of containers</u>	<u>Signed?</u>
008925264	1/9/2012	110	---	400.40	D001, F003	2 DR	X
008925264	1/9/2012	110	---	400.40	D001	2 DR	X
008925266	1/9/2012	---	50	22.73	D008	2 DF	X
008925266	1/9/2012	---	10	4.55	D002	1 DF	X
008925266	1/9/2012	---	10	4.55	D009, U151	1 DF	X
008925266	1/9/2012	---	400	181.82	NONE	1 DF	X
005015352	3/13/2012	55	---	200.20	D001, F003	1 DR	X
009543557	3/14/2012	---	120	54.55	D001	2 DF	X
009543557	3/14/2012	---	30	13.64	D002	1 DF	X
009543756	5/7/2012	---	675	306.82	D001, F003	2 DR	X
009543755	5/7/2012	---	50	22.73	D001, D002, U122	2 DF	X
009543755	5/7/2012	30	---	109.20	D002	2 DF	X
009543200	8/10/2012	40	---	145.60	D002	2 DF	X
009543200	8/10/2012	150	---	546.00	D002	3 DF	X
009543193	8/10/2012	---	900	409.09	D001, F003	2 DR	X
009544659	11/1/2012	---	250	113.64	D001, D035, F003, F005	1 DR	X
009544658	11/1/2012	---	450	204.55	D001, F003	1 DR	X
009544782	11/28/2012	---	300	136.36	D001, F003	1 DR	X
2012	Total	G	lbs	kg	monthly avg (kg)		
		495	3245	3276.80	273.07		
011074086	2/1/2013	---	750	340.91	D001, F003	2 DR	X
011074116	2/1/2013	---	100	45.45	D001	2 DF	X
011074395	4/25/2013	4500	---	16380.00	D002	18 TOTES	X
011074480	4/25/2013	---	900	409.09	D001, F003	2 DR	X
011073505	5/13/2013	2500	---	9100.00	D002	11 TOTES	X
011073505	5/13/2013	165	---	600.60	D002	3 DF	X
011073574	5/13/2013	30	---	109.2	D001	1 DR	X
010407232	6/21/2013	2131	---	7756.84	D002	1 TT	X
011073035	8/5/2013	---	800	363.64	D001, F003	2 DR	X
011073386	10/16/2013	---	450	204.55	D001, F003	1 DR	X
011696244 JJK	12/31/2013	3000	---	10920.00	D002	1 TT	X
2013	Total	G	lbs	kg	monthly avg (kg)		
		12326	3000	46230.28	3852.52		

Manifest #	Date	Amount (G)	Amount (lbs)	Amount (kg)	Waste Code(s)	# of containers	Signed?
012187401 JJK	1/6/2014	---	1000	454.55	D001, F003	2 DR	X
012187426 JJK	1/6/2014	4675	---	17017.00	D002	17 TOTES	X
012187402 JJK	1/7/2014	30	---	109.20	D002	1 DR	X
012187435 JJK	1/7/2014	---	14,850	6750.00	D002	6 TOTES	X
011694241 JJK	1/10/2014	1750	---	6370.00	D002	1 TT	X
012187425 JJK	1/10/2014	4675	---	17017.00	D002	17 TOTES	X
012187413 JJK	1/10/2014	4675	---	17017.00	D002	17 TOTES	X
012187414 JJK	2/11/2014	2850	---	10374.00	D002	6 TOTES	X
012187341 JJK	2/11/2014	---	450	204.55	D001, F003	1 DR	X
012186852 JJK	3/17/2014	30	---	109.20	D001	1 DR	X
012770555 JJK	3/25/2014	1050	---	3822.00	D002	1 TT	X
012186910 JJK	4/7/2014	55	---	200.20	D001, F003	1 DR	X
012186906 JJK	4/7/2014	---	40,500	18409.09	D002	15 TOTES	X
006923669 FLE	4/15/2014	5000	---	18200.00	D002	20 TOTES	X
013255066 JJK	6/2/2014	2300	---	8372.00	D002	1 TT	X
013255220 JJK	6/3/2014	2400	---	8736.00	D002	1 TT	X
013255221 JJK	6/4/2014	1800	---	6552.00	D002	1 TT	X
012187843 JJK	6/17/2014	30	---	109.20	D002	1 DR	X
012187833 JJK	6/17/2014	---	900	409.09	D001, F003	2 DR	X
012187844 JJK	6/17/2014	750	---	2730.00	D002	3 TOTES	X
012187844 JJK	6/17/2014	55	---	200.20	D002	1 DR	X
013398841 JJK	9/18/2014	---	1000	454.55	D001	1 TOTE	X
007685201 FLE	9/29/2014	2250	---	8190.00	D002	9 TOTES	X
007685200 FLE	9/29/2014	---	12,900	5863.64	D002	1 TT	X
007685256 FLE	9/30/2014	---	7760	3527.27	D002	1 TT	X
007684141 FLE	11/5/2014	1750	---	6370.00	D002	1 TT	X
007685041 FLE	12/11/2014	3400	---	12376.00	D002	14 TOTES	X
007684849 FLE	12/23/2014	---	5560	2527.27	D002	1 TT	X
007685113 FLE	12/23/2014	---	1000	454.55	D001, D022, F003	2 DR	X
007685113 FLE	12/23/2014	45	---	163.80	D001	1 DR	X
		G	lbs	kg	monthly avg (kg)		
2014	Total	39570	86,045	183146.16	15262.1803		

A BOLD ↑

<u>Manifest #</u>	<u>Date</u>	<u>Amount (G)</u>	<u>Amount (lbs)</u>	<u>Amount (kg)</u>	<u>Waste Code(s)</u>	<u># of containers</u>	<u>Signed?</u>
007685818 FLE	2/19/2015	2475	---	9009.00	D002	9 TOTES	X
007685819 FLE	2/19/2015	---	650	295.45	D001, D002, D022, F003	2 DR	X
008205536 FLE	5/15/2015	---	11,000	5000.00	D002	1 TT	X
008210118 FLE	6/1/2015	---	44,200	20090.91	D002	---	X
008210120 FLE	6/1/2015	---	900	409.09	D001, D002, D022, F003	2 DR	X
008210120 FLE	6/1/2015	---	100	45.45	D001, D002, D022, F003	1 DR	X
008210120 FLE	6/1/2015	---	450	204.55	D001	1 DR	X
008210119 FLE	6/1/2015	---	15,750	7159.09	D002	7 TOTES	X
007675178 FLE	6/29/2015	---	14,220	6463.64	D002	1 TT	X
008949059 FLE	8/13/2015	---	900	409.09	D001	2 DR	X
008949059 FLE	3/13/2015	---	60	27.27	D001, D002, D022, F003	1 DR	X
008949060 FLE	8/13/2015	---	23,500	10681.82	D002	9 TOTES	X
008947562 FLE	8/26/2015	4420	---	16088.80	D002	17 TOTES	X
008947675 FLE	9/4/2015	1040	---	3785.60	D002	4 TOTES	X
008947676 FLE	9/4/2015	---	70	31.82	D001, F003, F005	1 DR	X
008955819 FLE	11/13/2015	---	900	409.09	D001, D022, F003	2 DR	X
008955819 FLE	11/13/2015	---	38	17.27	D001	1 DR	X
2015	Total	G	lbs	kg	monthly avg (kg)		
		7935	112,738	80127.95	6677.328788		
009463724 FLE	2/23/2016	---	800	363.64	D001, D002, D022, F003	2 DR	X
009463724 FLE	2/23/2016	---	80	36.36	D001	1 DR	X
009463724 FLE	2/23/2016	---	300	136.36	D002	2 DR	X
009416670 FLE	5/5/2016	---	1000	454.55	D001, D022, F003	2 DR	NO
2016	Total	G	lbs	kg	monthly avg (kg)		
		---	2180	990.91	220.20		

Certificate

This is to certify that
Daniel Dule
Henkel Consumer Goods Inc

has successfully completed

DOT Hazardous Materials Training

and has been trained and tested in General Awareness, Function-Specific, Safety, and Security Awareness in
accordance with the requirements of the US Department of Transportation at
49 CFR 172.702 and 49 CFR 172.704

presented by

Environmental Resource Center
101 Center Pointe Drive, Cary, NC 27513 919-469-1585
www.ercweb.com

Barry Gillespie

April 26, 2012

Barry Gillespie, Instructor

Employer

Certificate Number: 121816

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1.0 Introduction

On May 17, 2016, the United States Environmental Protection Agency, Region III ("EPA") Land and Chemicals Division ("LCD"), Office of Land Enforcement conducted an unannounced Compliance Evaluation Inspection ("CEI") under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. of Dial Corporation ("Dial" or Facility"). EPA LCD Representatives notified Pennsylvania Department of Environmental Protection ("PADEP") of the inspection. No PADEP representatives were present for the inspection.

Inspectors arrived at the Facility around 9:30AM. There was a sign outside the Facility that said Henkel. Upon entering, inspectors confirmed that Henkel is the parent company that Dial is under and that the Facility's official name is Dial Corporation. Inspectors entered the building and were greeted by a security guard who instructed the inspectors to watch a safety video and sign in on the guest log before they could go any further into the Facility. The inspectors were then greeted by Facility representatives, Janine Surmick and Tony Swetz. Inspectors showed them their credentials and shared with them the scope of the inspection. Facility representatives directed inspectors to a conference room where they gathered some background information about the Facility, its processes, and its waste generation.

2.0 Facility Background Information

2.1 Description of Facility

Dial is mainly an antibacterial soap and laundry detergent manufacturer that carries out operations in an approximately 260,000 square foot building. The Facility employs about 186 people and operates during 3 shifts, 5 days a week with weekend overtime. The Facility was established in this location in 1988 and has a sister facility in St. Louis, Missouri. The Facility's products go solely to distribution centers. According to Facility representative, products never go directly to household customers, but to distribution centers before they are placed in retail stores.

generated here @ the Fac.

2.2 Facility Permit Status

The Facility currently has a Storm Water Permit and a Waste Water Treatment Permit for the discharge of waste water from cleaning out batch tanks and water that goes down the sinks located in the Lab. See Records Review section for a copy of the Waste Water permit.

more information ✓

2.3 Process Description

The Facility receives bulk chemical raw materials through a loading dock outside of the Facility. Tanker trucks hook up lines that feed directly into batch tanks or raw material holding tanks for either laundry care or beauty care.

The Facility's laundry care involves an all automated process of mostly bulk addition of raw materials to batch tanks with minor addition of dyes. For beauty care, the Facility employees pre-weigh and stage minor materials that are added into batch tanks. Beauty care also involves the addition of chemicals from totes that are either manually added to product mixing tanks, or automatically pumped into tanks.

The Facility includes an upstairs and a downstairs. Downstairs the batch raw materials coming into the Facility are approved and added to bulk mixing tanks. Upstairs the finished products are filled into their appropriate containers, capped, and labeled, before heading back downstairs to the customer service and shipping area.

3.0 Hazardous and Non-Hazardous Waste Generation

- Solvent waste generated in quality testing lab, including MIBK, chloroform, and ethanol used for cleaning and in HPLC machines.
- Waste water from cleaning batch tanks and equipment. No solvents ^{are} used to clean tanks, only hot water or caustic wash. Collected within holding tanks. ^{post-cleaning rinse water is below batch tanks} One stream generated from laundry care area and one stream generated from beauty care area. They are joined together through piping and into a tank before it is sent across the street to sewer authority. ^{Facility has a} Discharge permit with Greater Hazelton Joint Sewer Authority. According to Facility representative, although it is not part of the Facility's Waste Water Permit requirements, sometimes they adjust for pH on site. ^{new word}
- Packaging goods (plastic wrap, plastics containers, cardboard, etc.) all recycled ^{that are raw product}
- Alcohol ethoxysulfate ("AES") – waste generated from either routine testing of the AES or when AES raw product becomes ^{acidified} due to the chemical's instability. Waste can be hazardous or nonhazardous, according to Facility representatives, depending on the drop in pH. Facility representatives described this waste stream to be occasional during upsets. ^{from hydrolyzation}
- Universal waste – including waste lamps and waste batteries ^{and only}

4.0 Facility Generator Status

At the time of the inspection the Facility representatives stated that Dial is a Small Quantity Generator ("SQG"). The Facility notified the state of its SQG status in 1989 and has not sent a subsequent notification to PADEP or the EPA since.

During the opening conference, Facility representative stated that the Facility may go over into Large Quantity Generator Status ("LQG") on occasion due to acidification of AES raw product. See Section 7.9 in Records Review for more details on Facility waste generation.

5.0 Hazardous Waste Storage

5.1 Less-Than 180-Day Storage Area

The Facility has one (1) less-than 180-day Hazardous Waste Accumulation Area ("HWAA"). It is a flammable storage cabinet that stores two (2) 55-gallon drums. The HWAA is located on the packaging floor in the upstairs area of the Facility. See Inspection Observations for more detail.

5.2 Satellite Accumulation Storage Area

The Facility utilizes Satellite Accumulation Area ("SAA") containers within their quality testing lab. There were five (5) 1-gallon SAA containers within the lab at the time of the inspection.

The Facility also utilizes two (2) SAA containers for collecting waste aerosol cans before they are taken to the Maintenance Shop to be punctured. See Inspection Observations for more detail.

5.3 Universal Waste Storage Area

The Facility stores its Universal Waste ("UW") in The Pit / Recycling Area. The UW lamps are stored in cardboard boxes and the UW batteries are stored in plastic buckets. See Inspection Observations for more details.

6.0 Inspection Observations

6.1 Offloading Station

The Facility's Offloading Station is located outside the Facility where bulk tanker trucks can drive up and deliver various raw products. There are a number of manifolds that feed through the wall of the Facility's building near the Offloading Station and lead directly into batch tanks. The main section of the Offloading Station can be seen in Photo #1. Other lines that trucks can connect to near the main station can be seen in Photo #2 and a safety sign posted at the Offloading Station can be seen in Photo #3.

Facility representative stated that they rarely clean out the pipe lines leading into the Facility from the Offloading Station because they use the same line for the same product for as long as possible. In the case that the Facility would have to switch lines, they would clean out the line with an appropriate material and send it off as either hazardous or nonhazardous waste depending on what they used.

6.2 Laundry Care Area

Inspectors left the Offloading Station and entered the building through a door that led into the Facility's Laundry Care Area. Upon entering they observed two, 2,500-pound totes that contained AES (See Photo #4). The tote on the right was labeled as non-hazardous waste (See Photo #5), while the tote on the left was labeled as "acidic AES" (See Photo #6). According to Facility representatives, the AES waste was generated from routine testing of the raw product. Facility representatives stated that this AES in particular was tested and did not meet product specifications. Although the AES can acidify to the point where it is below a pH of 2 and is considered a hazardous waste, Facility representatives stated that they cannot use the AES if it is below a pH of 8.2. According to Facility representatives the totes pictured ^{have} a pH of less than 8.2, but above 2.0.

Inspectors questioned Facility representatives on whether the AES could acidify further due to its instability and become hazardous. They stated that they will test the material again before it is shipped off site as a waste. Facility representatives also stated that the manufacturer of the AES has made some changes to the material in order to make it more stable.

There was a funnel and bucket on top of one of the AES totes (See Photo #7). According to Facility representatives this was used for testing the AES material inside the totes. Similar buckets were seen to the right of the totes turned upside down on a spill container (See Photo #8). A close up of the container can be seen in Photo #9. According to Facility representatives, these buckets are used to test incoming raw material from the tanker trucks before they unload it into the batch tanks. Typically this material is not hazardous, unless the AES has acidified before it arrived to the Facility, in which case inspectors cautioned Facility representatives to treat ^{this} waste accordingly if it is ever hazardous.

Inspectors walked through the Laundry care area of the Facility and observed many batch tanks. Inspectors asked the Facility representatives how the tanks are cleaned. They stated that they are cleaned regularly with a caustic wash (see Records Review section for SDS). After cleaning the tanks, the caustic wash along with any tank residue is drained into holding tanks before it is sent out to the sewer authority. Waste water from the Laundry Care Area and the Beauty Care Area are combined through piping into a tank before it is sent out. Facility representative stated that the combination of the two waste water streams usually balances out the pH, but that they will add sodium carbonate or citric acid as necessary to bring the pH up or down before sending it off. ^{occasionally}

6.3 Beauty Care Area

Next, the inspectors entered the raw material storage area for beauty care. Upon entering the storage area, inspectors observed raw product that had some of its contents spilled onto the warehouse floor (See Photo #10). A close-up of this material can be seen in Photo #11. Facility representative said that typically the manager of the area on duty that day will come around and inspect everything and clean up any spills of this type and dispose of the material accordingly.

The rest of the raw product storage area appeared to be managed and organized well and there were no other spills or concerns noted in that area.

6.4 Packaging Area

Upon entering the Packaging area, inspectors observed a plastic cabinet that contains two 55-gallon drums of waste oil (See Photo #12). Inspectors noted that one of the bungs on a waste oil drum was open (See Photo #13).

Next to the plastic cabinet was a plastic container that was labeled "Empty Aerosol Cans Only". The lid of the container had an open hole in the middle of it (See Photo #14). The Facility accumulates spent aerosol cans in this container before they are taken to the Maintenance Shop off of the Packaging Line to be punctured.

collected biweekly

Inspectors observed three beauty packaging lines and 4 laundry packaging lines. The only waste generated in this area, according to Facility representatives, is recyclable material, like excess plastic wrap or product containers that fell on the floor. The Facility has large wooden recycling crates near the packaging lines for employees to separate these materials into.

6.5 Shipping Area

Inspectors observed a maintenance shop off of the Shipping Area. Within this maintenance shop was a parts wash station that was labeled with a Crystal Clean logo and according to Facility representatives is managed by Crystal Clean (See Photo #15).

In the Shipping Area, inspectors observed many pallets full of boxed product that were wrapped in tarp. This area contained all products that were ready to be shipped out to one of the four domestic warehouses that this Facility supplies to.

6.6 Lab

Outside of the Facility's quality testing was a washer and dryer. Facility representative stated that these are used to launder rags used for maintenance and that no solvents are used ~~for~~ ~~these~~ on these rags.

Upon entering the lab, inspectors met the Facility's Lab Quality Manager, Mr. Dan Dule who answered inspectors' questions regarding the lab. There were five satellite containers in use within the lab at the time of the inspection that were approximately 1 gallon each. Three were labeled as "LC Mobile Phase Waste" and two were labeled as "MIBK/Ethanol Waste" (See Photos #16-20). One of the satellite accumulation containers within a fume hood was open when inspectors observed it but they also saw an employee working nearby that entered the fume hood to continue ~~working~~ operations as the inspectors walked away.

See Photo #

The satellite accumulation containers within the lab are used to collect waste coming from the HPLC machines the Facility uses to test product quality and for cleaning or other testing purposes within fume hoods. A Facility employee stated that the satellite accumulation containers are usually emptied once or twice a day and are not usually full when they do so. Facility representatives also stated that the sinks within the lab are connected to the waste water treatment tank.

6.7 Hazardous Waste Accumulation Area

Inspectors observed the Facility's HWAA to be a flammable storage cabinet against the wall near the packaging lines (See Photo #21). Within the storage cabinet was two 55-gallon drums (See Photo #22). The drum on the left contained hazardous waste, while the drum on the right was empty. They were both labeled as hazardous waste and the drum on the left had a start accumulation date of "5-5-16" and was labeled as "Mobile Phase Waste" (See Photo #23). An addition label on the left side drum can be seen in Photo #24.

Facility representatives stated that once one of the drums is full, they begin to fill the other one. Once both of them are full, they transfer them ~~to the~~ downstairs ~~down~~ to be shipped. The Facility fills two 55-gallon drums about every two months, or one 55-gallon drum per month.

There was an emergency spill kit located inside of the storage cabinet and emergency information posted outside the side of the cabinet (See Photo #25). A phone was observed nearby.

Next to the HWAA was a second plastic container labeled "Empty Aerosol Cans Only" with a hole in the top of its lid (See Photo #26). Upon opening the container, inspectors observed 2 aerosol cans (See Photo #27).

6.8 Universal Waste Storage Area

The Facility's UW is stored in an area called "The Pit / Recycling Area". Upon entering this area, inspectors observed shelving that contained waste ink on it. Facility representative stated that typically they let the ink evaporate and then it is recycled. Upon inquiring, Facility representatives provided the inspectors with the SDSs for the two types of inks seen on the shelf to confirm that they were not solvent based (See Record Review section for SDSs) (See Photos #28-#31).

Next to the shelf with the waste ink on it was another shelf containing the UW lamps. When the inspector asked the Facility representative to turn the box so that they could look for a start accumulation date, the end of the cardboard box ripped off (See Photo #32). There were three boxes of UW lamps present at the time of the inspection. One had a start date of "12-9-15", one of "3-30-16", and one of "10-6-15". The inspectors looked to see if the boxes were labeled as "Universal Waste" and could not find a label initially. Upon looking, Facility representative discovered that the Universal Waste label was located under the shipping label and had not had the "lamp" box checked off (See Photo #33).

On the same shelving was the Facility's UW batteries (See Photo #34). The two buckets seen in Photo #34 were labeled with start accumulation dates of "4/7/16" and "5/9/16" and were labeled as "1 GAL DRY CELL BATTERY RECYCLING KIT" (See Photo #35). The batteries within the buckets were individually bagged. There was an additional UW battery bucket on the bottom shelf that according to Facility representatives contained mixed waste batteries (See Photo #36). This bucket did not have a start accumulation date on it.

Also observed in this area were large wooden crates containing separated recyclable material including electric wires, cardboard, and plastic containers. There was an open "Duffy" trailer connected to the loading dock in this area that the Facility employees fill up and ship off to the recycling company who leave an empty trailer each time. Facility representatives stated that they recycle about 35-40 tons of material per month.

6.9 Maintenance Shop off of Packaging Line

Within this additional Maintenance Shop, inspectors observed an aerosol can puncturing unit that was attached to a 35-gallon drum (See Photo #37). There was a start accumulation date of "2/28/16" on the drum (See Photo #38). Facility representative stated that he collects the aerosol cans from the two satellite accumulation containers biweekly and that there is usually 8 or 9 every other week total. There is a bagged liner inside of the drum that collects the aerosol contents when the cans are punctured. A waste oil drum with an open funnel was also observed in this area (See Photos #39 and #40).

Across the room, inspectors observed a flammable cabinet that contained unused or in-use aerosol cans (See Photos #41 - #43).

7.0 Records Review

Inspectors asked Facility representatives to see various records for review. The requested documents are as follows:

7.1 Safety Data Sheet (SDS) for:

- Squid Ink (SI-60-P) seen in Photo #29 (Attachment A)
- TWP-181 Ink seen in Photo #30 (Attachment B)
- AES (Sodium Laureth Sulfate 7EO) (Attachment C)
- Caustic Wash (CP-750) (Attachment D)

7.2 Training records for:

- Daniel Dule (Lab Manager), 3 years (Attachment E)
- Tony Swetz (Environmental Coordinator), 3 years (Attachment F)

7.3 Biennial Report

- Facility has never submitted a biennial report according to Facility representatives.

7.4 Contingency Plan

- Facility did not have a contingency plan at the time of the inspection. They did have an Emergency Response Plan that they provided to inspectors seen in Attachment G.

7.5 Weekly Inspection Logs for Hazardous Waste Accumulation Area

- 3 years of logs were reviewed
- Signed by a (“PO”) Patty O’Donnell. Facility did not have training records for Ms. O’Donnell.
- Examples of weekly inspection logs seen in Attachment H.

7.6 Bills of Lading (“BOLs”) for Universal Waste Shipments

- 3 years of BOLs for UW shipments were reviewed by inspectors. Copies of the most recent shipment can be seen in Attachment I.

7.7 BOLs for Sale of “Clean Out” AES

- Inspector inquired if the Facility can or does recycle hydrolyzed AES. They did not show any instances of recycling AES, but stated that on two occasions they sold unused and unhydrolyzed AES that was generated from 2 separate system clean outs while switching over to a new formulation of the material. The two BOLs can be seen in Attachment J.

7.8 Waste Water Treatment Permit

- Inspectors requested a copy of the Facility’s Waste Water Treatment permit that can be seen in Attachment K

7.9 Hazardous Waste Manifests

- 5 years of HW Manifests were requested by inspectors. Facility representative stated that the Facility has a 3 year retention policy for HW Manifests and would bring as far back as they had. Examples of Facility Hazardous Waste Manifests can be seen in Attachment L.
- The “occasional” upset the Facility described when addressing sending acidified AES off as HW appeared on the manifests much more frequently than the Facility representatives had originally described.

- Chart beginning on page 12 of this inspection report depicts HW Manifest information from 1-9-12 through 5-5-16.

8.0 Post-Inspection Documents Addressing Inspection Observations

Subsequent to the CEI performed at the Facility on 5/17/16, Facility representative sent an email to the EPA documenting the actions they have taken on some of the observations made during the inspection. That email can be seen in Attachment M.

<u>Manifest #</u>	<u>Date</u>	<u>Amount (G)</u>	<u>Amount (lbs)</u>	<u>Amount (kg)</u>	<u>Waste Code(s)</u>	<u># of containers</u>	<u>Signed?</u>
008925264	1/9/2012	110	---	400.40	D001, F003	2 DR	X
008925264	1/9/2012	110	---	400.40	D001	2 DR	X
008925266	1/9/2012	---	50	22.73	D008	2 DF	X
008925266	1/9/2012	---	10	4.55	D002	1 DF	X
008925266	1/9/2012	---	10	4.55	D009, U151	1 DF	X
008925266	1/9/2012	---	400	181.82	NONE	1 DF	X
005015352	3/13/2012	55	---	200.20	D001, F003	1 DR	X
009543557	3/14/2012	---	120	54.55	D001	2 DF	X
009543557	3/14/2012	---	30	13.64	D002	1 DF	X
009543756	5/7/2012	---	675	306.82	D001, F003	2 DR	X
009543755	5/7/2012	---	50	22.73	D001, D002, U122	2 DF	X
009543755	5/7/2012	30	---	109.20	D002	2 DF	X
009543200	8/10/2012	40	---	145.60	D002	2 DF	X
009543200	8/10/2012	150	---	546.00	D002	3 DF	X
009543193	8/10/2012	---	900	409.09	D001, F003	2 DR	X
009544659	11/1/2012	---	250	113.64	D001, D035, F003, F005	1 DR	X
009544658	11/1/2012	---	450	204.55	D001, F003	1 DR	X
009544782	11/28/2012	---	300	136.36	D001, F003	1 DR	X
2012	Total	G	lbs	kg	monthly avg (kg)		
		495	3245	3276.80	273.07		
011074086	2/1/2013	---	750	340.91	D001, F003	2 DR	X
011074116	2/1/2013	---	100	45.45	D001	2 DF	X
011074395	4/25/2013	4500	---	16380.00	D002	18 TOTES	X
011074480	4/25/2013	---	900	409.09	D001, F003	2 DR	X
011073505	5/13/2013	2500	---	9100.00	D002	11 TOTES	X
011073505	5/13/2013	165	---	600.60	D002	3 DF	X
011073574	5/13/2013	30	---	109.2	D001	1 DR	X
010407232	6/21/2013	2131	---	7756.84	D002	1 TT	X
011073035	8/5/2013	---	800	363.64	D001, F003	2 DR	X
011073386	10/16/2013	---	450	204.55	D001, F003	1 DR	X
011696244 JJK	12/31/2013	3000	---	10920.00	D002	1 TT	X
2013	Total	G	lbs	kg	monthly avg (kg)		
			3000	46230.28	3852.52		

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Manifest #	Date	Amount (G)	Amount (lbs)	Amount (kg)	Waste Code(s)	# of containers	Signed?
012187401 JJK	1/6/2014	---	1000	454.55	D001, F003	2 DR	X
012187426 JJK	1/6/2014	4675	---	17017.00	D002	17 TOTES	X
012187402 JJK	1/7/2014	30	---	109.20	D002	1 DR	X
012187435 JJK	1/7/2014	---	14,850	6750.00	D002	6 TOTES	X
011694241 JJK	1/10/2014	1750	---	6370.00	D002	1 TT	X
012187425 JJK	1/10/2014	4675	---	17017.00	D002	17 TOTES	X
012187413 JJK	1/10/2014	4675	---	17017.00	D002	17 TOTES	X
012187414 JJK	2/11/2014	2850	---	10374.00	D002	6 TOTES	X
012187341 JJK	2/11/2014	---	450	204.55	D001, F003	1 DR	X
012186852 JJK	3/17/2014	30	---	109.20	D001	1 DR	X
012770555 JJK	3/25/2014	1050	---	3822.00	D002	1 TT	X
012186910 JJK	4/7/2014	55	---	200.20	D001, F003	1 DR	X
012186906 JJK	4/7/2014	---	40,500	18409.09	D002	15 TOTES	X
012186906 JJK	4/7/2014	---	125	56.82	D002	1 DR	X
006923669 FLE	4/15/2014	5000	---	18200.00	D002	20 TOTES	X
013255066 JJK	6/2/2014	2300	---	8372.00	D002	1 TT	X
013255220 JJK	6/3/2014	2400	---	8736.00	D002	1 TT	X
013255221 JJK	6/4/2014	1800	---	6552.00	D002	1 TT	X
012187843 JJK	6/17/2014	30	---	109.20	D002	1 DR	X
012187833 JJK	6/17/2014	---	900	409.09	D001, F003	2 DR	X
012187844 JJK	6/17/2014	750	---	2730.00	D002	3 TOTES	X
012187844 JJK	6/17/2014	55	---	200.20	D002	1 DR	X
013398841 JJK	9/18/2014	---	1000	454.55	D001	1 TOTE	X
007685201 FLE	9/29/2014	2250	---	8190.00	D002	9 TOTES	X
007685200 FLE	9/29/2014	---	12,900	5863.64	D002	1 TT	X
007685256 FLE	9/30/2014	---	7760	3527.27	D002	1 TT	X
007684141 FLE	11/5/2014	1750	---	6370.00	D002	1 TT	X
007685041 FLE	12/11/2014	3400	---	12376.00	D002	14 TOTES	X
007684849 FLE	12/23/2014	---	5560	2527.27	D002	1 TT	X
007685113 FLE	12/23/2014	---	1000	454.55	D001, D022, F003	2 DR	X
007685113 FLE	12/23/2014	45	---	163.80	D001	1 DR	X
Total		39570	86,045	183146.16	15262.18	kg monthly avg (kg)	

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<u>Manifest #</u>	<u>Date</u>	<u>Amount (G)</u>	<u>Amount (lbs)</u>	<u>Amount (kg)</u>	<u>Waste Code(s)</u>	<u># of containers</u>	<u>Signed?</u>
007685818 FLE	2/19/2015	2475	---	9009.00	D002	9 TOTES	X
007685819 FLE	2/19/2015	---	650	295.45	D001, D002, D022, F003	2 DR	X
008205536 FLE	5/15/2015	---	11,000	5000.00	D002	1 TT	X
008210118 FLE	6/1/2015	---	44,200	20090.91	D002	---	X
008210120 FLE	6/1/2015	---	900	409.09	D001, D002, D022, F003	2 DR	X
008210120 FLE	6/1/2015	---	100	45.45	D001, D002, D022, F003	1 DR	X
008210120 FLE	6/1/2015	---	450	204.55	D001	1 DR	X
008210119 FLE	6/1/2015	---	15,750	7159.09	D002	7 TOTES	X
007675178 FLE	6/29/2015	---	14,220	6463.64	D002	1 TT	X
008949059 FLE	8/13/2015	---	900	409.09	D001	2 DR	X
008949059 FLE	8/13/2015	---	60	27.27	D001, D002, D022, F003	1 DR	X
008949060 FLE	8/13/2015	---	23,500	10681.82	D002	9 TOTES	X
008947562 FLE	8/26/2015	4420	---	16088.80	D002	17 TOTES	X
008947675 FLE	9/4/2015	1040	---	3785.60	D002	4 TOTES	X
008947676 FLE	9/4/2015	---	70	31.82	D001, F003, F005	1 DR	X
008955819 FLE	11/13/2015	---	900	409.09	D001, D022, F003	2 DR	X
008955819 FLE	11/13/2015	---	38	17.27	D001	1 DR	X
2015	Total	G	lbs	kg	monthly avg (kg)		
		7935	112,738	80127.95	6677.33		
009463724 FLE	2/23/2016	---	800	363.64	D001, D002, D022, F003	2 DR	X
009463724 FLE	2/23/2016	---	80	36.36	D001	1 DR	X
009463724 FLE	2/23/2016	---	300	136.36	D002	2 DR	X
009416670 FLE	5/5/2016	---	1000	454.55	D001, D022, F003	2 DR	NO
2016	Total	G	lbs	kg	monthly avg (kg)		
		---	2180	990.91	220.20		